POOR LEGIBILITY

ONE OR MORE PAGES IN THIS DOCUMENT ARE DIFFICULT TO READ
DUE TO THE QUALITY OF THE ORIGINAL

PRELIMINARY ASSESSMENT
RECOMMENDATIONS FOR FURTHER ACTION

DATE: October 23,1987

PREPARED BY: Alfred Wanger

SITE: Ford Aerospace
1036 East Meadow Circle
Palo Alto, CA 94303

EPA ID#: CAD000030528

ASPIS ID#: 43-36-0074

Initial DHS Conclusions and Recommendations for Further Action:

Site Description:

Ford Aerospace Corporation is located at 1036 E, Meadow Circle, in the City of Palo Alto, California (see Site Location Map, Figure 1.0). Ford Aerospace has leased this site from California Pacific Corporation since 1965 (1). . The site is currently used as a machine shop, sheet metal fabrication and accumulation point for hazardous waste from current operations. Wastes generated from current operations include solvents, cutting oils, and coolants (1). Wastes are stored in 55 gallon drums until transported to Building 4 at Ford's main facility two blocks away at 3939 Fabian Way (1).

Apparent Problem:

Between late 1980 and early 1982, Ford used the site at 1036 E. Meadow Circle (Building 12) as a hazardous waste storage facility. The Department of Health Services (DHS) issued an Interim Status Document (ISD) for this facility December 16, 1981 (1). Ford Aerospace also submitted a Part A application for the E. Meadow Circle site to the Environmental Protection Agency (EPA) (2).

Wastes were stored in 55 gallon drums in the rear portion of the site (see Figure 2.0). The drums sat directly on asphalt pavement, and were surrounded with sandbag dikes (3). Adobe Creek, which is located approximately thirty feet from the storage area, is diked six feet above the storage area (3). The entire facility was fenced. A summary of wastes handled at the storage facility during 1981 is presented in Appendix A.

Ford Aerospace closed the Meadow Circle site (Bldg. 12) as a hazardous waste storage facility in early 1982 and DHS rescinded the ISD (1). According to Catherine Moody from DHS, there is

Source: Mountain View Quadrangle, 7.5 Minute Series, U.S.G.S. Topo

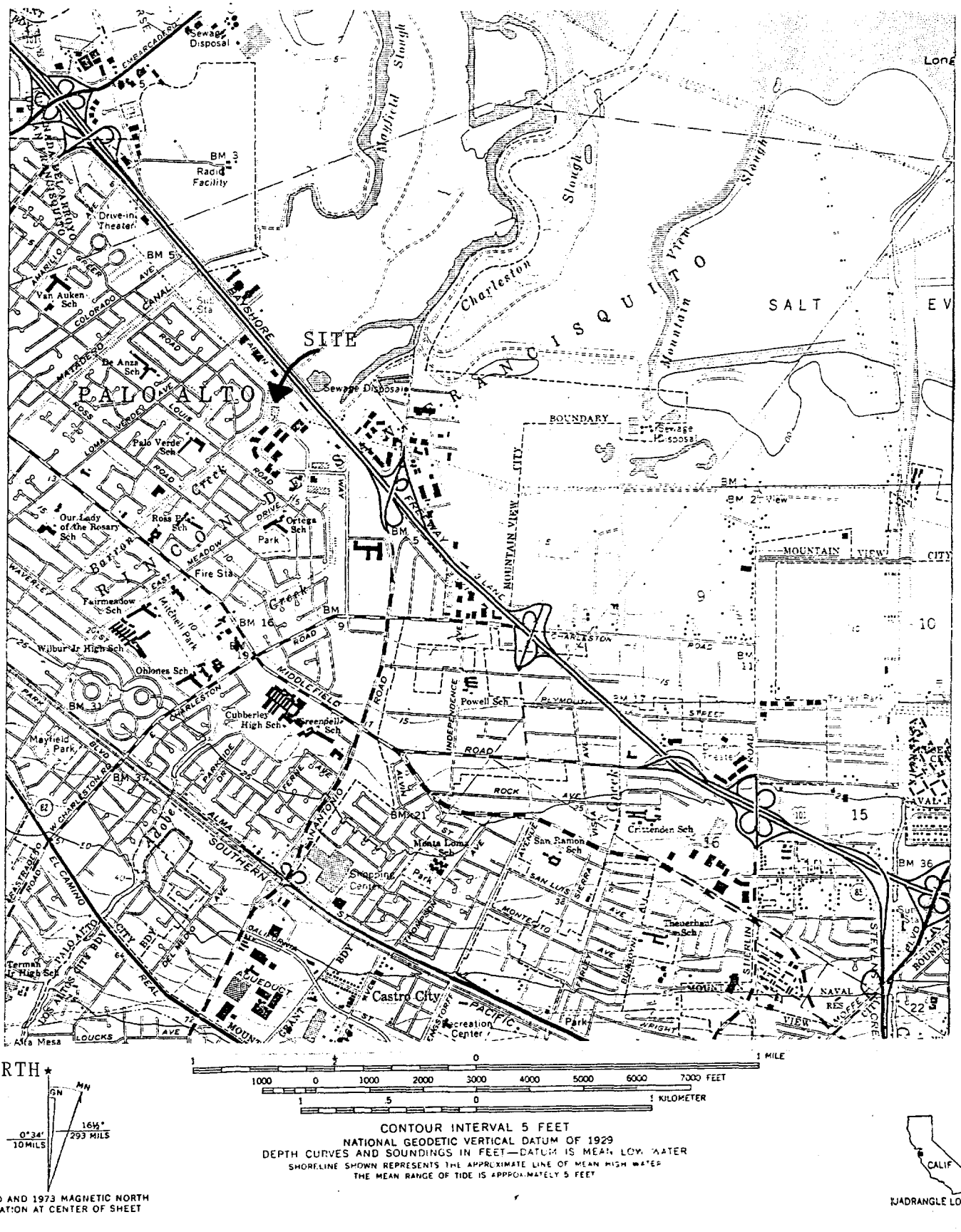
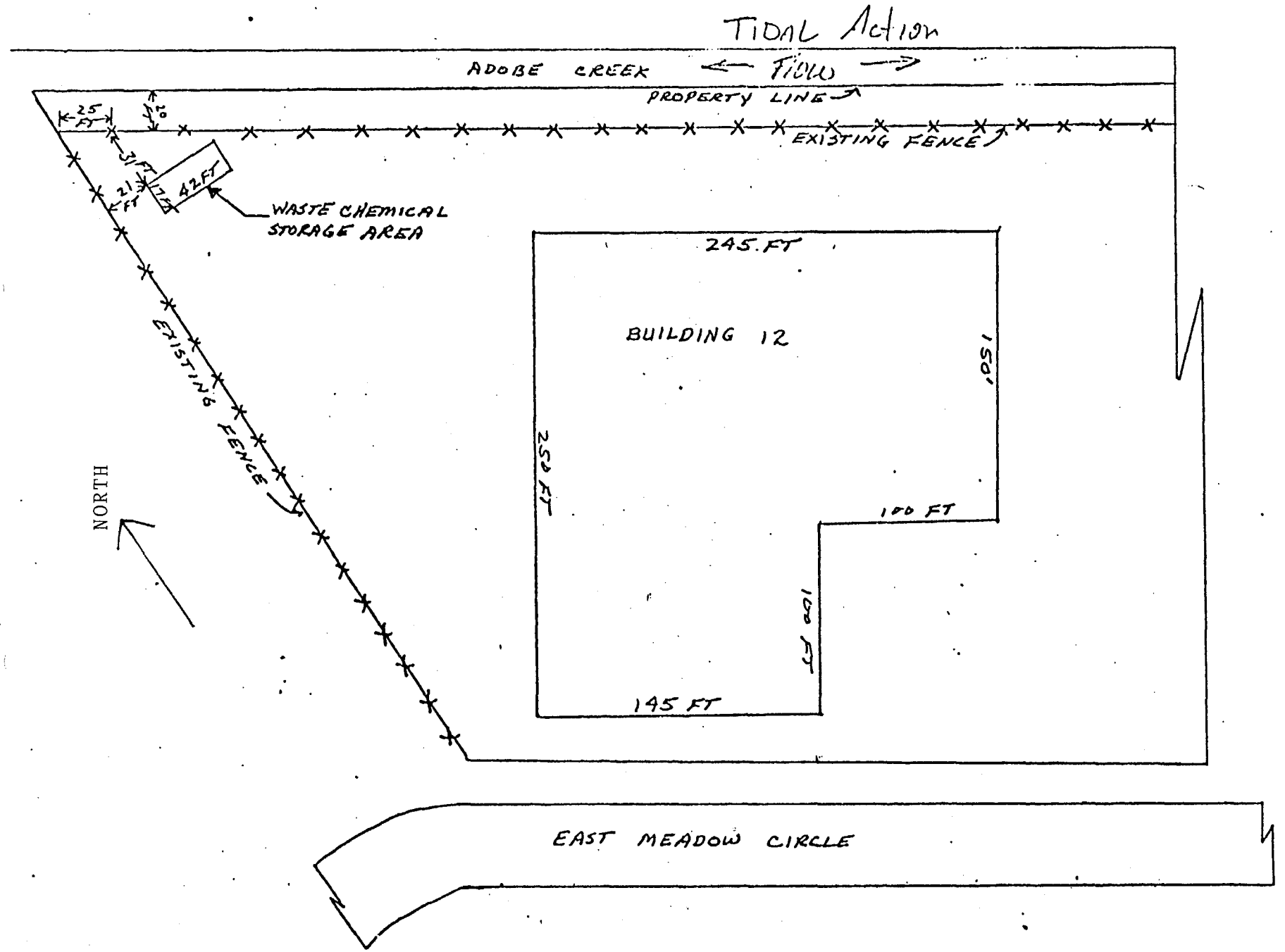


Figure 1.0: Site Location Map of Ford Aerospace, 1036 East Meadow Circle, Palo Alto, CA.



APPROXIMATE SCALE: 1 INCH = 75 FT

Figure 2.0: Facility Map

some question whether this site was properly closed in 1982 (1,4). Part of the closure, as required by the ISD, must consist of an evaluation by a registered professional engineer from outside the company to determine whether the site is free of contamination (1,5). Additionally, there is reference in DHS files to decontamination procedures performed by IT Corporation, such as detergent and steam cleaning of the site (1,6).

Ford maintains that all the requirements for closure were met, including certification by a professional engineer, and that all the paperwork for closure was submitted to DHS in 1982 (7). However, no documentation has been located in regulatory agency files to indicate that the site was closed properly (1,4,8). Ford is unable to provide copies of the closure documentation to DHS because of an internal policy that calls for the destruction of old files after three years (7).

Decontamination procedures performed by IT Corp., were connected with a complaint of improper PCB storage, and subsequent inspection to determine compliance with PCB disposal and marking regulations. According to the complaint, approximately 70-80 fifty five gallon drums of PCB's were stacked three high on an asphalt lot on Ford's property. The drums did not have proper labels on them, instead having the letters "PCB" painted on them (3).

An inspection team from EPA's contractor, VERSAR, Inc., found thirty 55-gallon drums with the letters "PCB" stenciled on them, and one 12 ft x 18 ft x 24 ft wooden packing crate with no labeling or stenciling in the PCB storage area (3). Only two of the 55-gallon drums contained PCB light ballast capacitors; the remaining drums were empty (3). The packing crate contained a large low voltage structurally undamaged PCB capacitor (3). EPA findings state that neither the drums or the capacitor were properly marked as PCB items. Additionally, the storage area was not bermed or protected from rainfall, though it was paved (3). However, no evidence of contamination was found in the storage area during the inspection (3).

According to Dan Hernandez of Ford Aerospace, the cleaning operations performed by IT were undertaken as a precautionary measure, and not because of any contamination at the site (7).

b. <u>HRS Factors</u>

There is no documentation of an observed release at the Ford Aerospace Meadow Circle facility. There is no evidence in regulatory agency files to indicate any potential releases to the environment. However, soil sampling should be conducted to confirm that there has been no release to the environment.

Conclusions and Recommendations:

Ford Aerospace used this site as a storage facility for hazardous wastes from 1980 to early 1982. Ford Aerospace received an ISD from DHS for the storage facility in September 1981. The ISD was rescinded by DHS when Ford Aerospace closed the facility for storage of hazardous wastes in 1982.

Regulatory agency records do not indicated whether the Ford Aerospace facility underwent proper closure. There is no evidence of contamination at the facility, and the remaining issue appears to be whether the facility was evaluated by a registered professional engineer.

EPA Recommendation:

No Further Action under CERCLA

DHS Recommendation:

State Site Inspection-Low Priority. Soil sampling should be conducted to determine whether any contamination exists under or around the former storage area. If no contamination exists the site should be certified as properly closed and removed from Pending status. If contamination is found, Ford Aerospace should be required to conduct an investigation to determine the extent of contamination and identify remedial alternatives.

REFERENCES

1. Draft Preliminary Assessment, Ford Aerospace Corporation, June 1986, Michael Pardee.

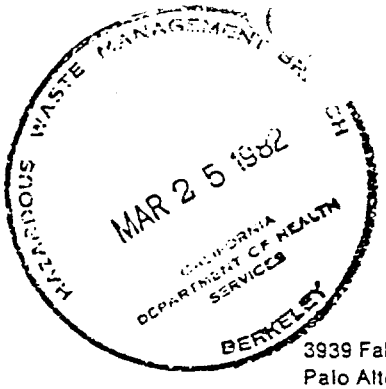
2. DHS File: Report on Inspection to Determine Compliance with the PCB Disposal and Marking Regulations; Ford Aerospace, 1036 E. Meadow Circle, Palo Alto, California; February 5, 1981; Performed by VERSAR, Inc. for the EPA.

3. Contact Report between Al Wanger, DHS, and Katherine Moody, DHS, August 19, 1987. See Contact Report.

4. DHS File: Letter from Dan Hernandez, Ford Aerospace, to Blake Spears, DHS, summarizing closure of the E. Meadow Circle Facility, March 22, 1982.

5. Contact Report between Al Wanger, DHS, and Dan Hernandez, Ford Aerospace, September 18, 1987. See Contact Report.

APPENDIX A



Ford Aerospace &
Communications Corporation
Western Development
Laboratories Division

3939 Fabian Way
Palo Alto, California 94303

March 23, 1982

California Department of Health Services
Hazardous Materials Management Section
2151 Berkeley Way
Berkeley, California 94704

Attention Mr. Chris Knoblock

Dear Mr. Knoblock:

The attached information is submitted as an Annual Report summarizing hazardous waste facility activities for the calendar year period beginning January 1, 1981 and ending December 31, 1981.

Sincerely,

FORD AEROSPACE &
COMMUNICATIONS CORPORATION
WDL Division

Dan Hernandez
Division Industrial Hygienist

cc: File
Operating Log

Annual Report
Hazardous Waste Facility Activities
January 1, 1981 - December 31, 1981

A. Ford Aerospace & Communications Corporation, WDL Division,
1036 East Meadow Circle, Palo Alto, California 94303
EPA #CAD000030528

B. Calendar year of 1981

C. Description and quantity of hazardous wastes received during the period:

1. Electroplating and metal finish solutions: (chromic acid, hydrochloric acid, sulfuric acid, phosphoric acid, hydrofluoric acid, nitric acid, ferric chloride)	6250 gallons
2. Cyanide compounds (from electroplating operations)	275 gallons
3. Machine cutting fluid	1650 gallons
4. Caustics (sodium, potassium hydroxide) from electroplating operations	725 gallons
5. Degreasing and cleaning solvents (methylene chloride, 1-1-1-Trichloroethane, and chlorofluoro hydrocarbon solvents)	1485 gallons
6. Etching rinse solvents xylene, isopropanol, methanol, acetone, methyl ethyl ketone, toluene, ethanol	2365 gallons
7. Photolithography chemicals (Stoddard solvent, cellosolve acetate)	1095 gallons

D. Method of storage: DOT approved 55 gallon drums

E. Monitoring data: not applicable

F. Closure cost estimate: $33K

Certified by: _____
Dan Hernandez M.P.H.
Division Industrial Hygienist
Authorized Representative

cc: File
Operating Log

PRELIMINARY ASSESSMENT CONTACT LOG

Facility Name: Ford Aerospace
Facility ID: CAD000030528

Name	Affiliation	Phone	Date	Information
Catherine Moody	Napa County Environmental Health	(707) 253-4471	8/21/87	See Contact Report
Charlene Williams	DHS-NCCS	(415) 540-3051	8/24/87	See Contact Report
Doris Maez	Palo Alto Water Pollution Control Plant	(415) 329-2117	9/14/87	No information on site
Cynthia Sievers	Santa Clara County Department of Planning	(408) 299-2521	9/14/87	See Contact Report
Cliff Cahee	SFRWQCB	(415) 464-1255	9/14/87	No file on site
Steve Brooks	Santa Clara County Health - Hazardous Materials Program	(408) 299-6930	9/14/87	Contact Lee Esquibel
Lee Esquibel	Santa Clara County Health - Hazardous Materials Program	(408) 299-6930	9/15/87	No information on site
Glen Tsukamoto	Ford Aerospace	(415) 852-4012	9/15/87	See Contact Report
Dan Heiser	Palo Alto Fire Department	(415) 329-2324	9/15/87	See Contract Report
Isao Kobashi	Santa Clara County Hazardous Materials Coordinator	(408) 299-2566	9/18/87	No information on site
Dan Hernandez	Ford Aerospace	(415) 852-4012	9/18/87	See Contact Report
Amy Zimpfer	EPA	(415) 974-8603	9/29/87	See Contact Report
Mike Pardee	DHS - Abandoned Site Program	(916) 445-1803	9/29/87	See Contact Report

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
CALIFORNIA DEPARTMENT OF HEALTH SERVICES'
CERCLA GRANT PROGRAM
PRELIMINARY ASSESSMENT DATA SHEET

DRAFT

1. Site Name: FORD AEROSPACE 1036 E Meadow Circle Palo Alto

2.a EPA ID #: CAD980673925

b CA DHS ASPIS Facility File #: 43-36 - - - -

3.a. Site Location (street address): 1036 E. MEADOW CIRCLE PALO ALTO CA 94303

b. Latitude, Longitude (or township, range, & section):

c. Assessor's Parcel Number:

4. County: SANTA CLARA

	SOURCE	INFORMATION
5. Owners (Include name, address, and phone number):	A. DHS FILES; PA DATA SHEET. Phone CONTACT 6/86 DAN HERNANDEZ - FORD	A. Current Landowner: CALIFORNIA PACIFIC CORP. 2200 SANDHILL ROAD MENLO PARK, CA 94025 (415) 852-5104
	B. AEROSPACE	B. Past Landowner:
6. A. 1. Operator Of Record (Include name, address, phone number):	1. SAME AS #5A	1. FORD AEROSPACE AND COMMUNICATIONS 3939 FABIAN WAY PALO ALTO CA 94303 (415) 852-4012

DRAFT

	SOURCE	INFORMATION
2. Years Of Operation:	2. PA - FORD AEROSPACE	2. 2 years 1980-1982
B.1. Other Historical Operators of Concern:	1. SAME AS ABOVE	1. NONE
2. Years of Operation:	2. —	2. —
C.1. Current Operator (include name, address, and phone number):	1. ~~PA~~ - FORD AEROSPACE	1. FORD AEROSPACE
2. Years of Operation:	2.	2.
7. Status (Is the company of record active or inactive?)	"	ACTIVE
8. Type of Business/Process (Specify by operator for all operators of concern):	"	Machine work Sheet metal fabrication
9. Disposal Practices (Specify by operator, for each operator of concern):	"	Wastes Stored onsite under ISD 1980-1982 After 1982 wastes Stored less than 90 days and Shipped to FORD Storage at 3939 Fabian Way
10. Waste Types (Specify by operator for all operators of concern):	DHS Files	See Appendix A P.A. 10/23/87

DRAFT

	SOURCE	INFORMATION
11. Waste/Substances Storage Facilities (i.e., clarifier, tanks, drums, etc.) (Specify by operator for all operators of concern):	DHS Files PART A PERMIT P.A. 6/84	DRUMS
HAZARD RANKING		
12. Observed Release: a. Groundwater b. Surface water c. Air	PA DHS Files	NONE
13. Containment: a. Groundwater (liners, leachate collection systems etc.) b. Surface water (diversion structures, sealed containers, etc.) c. Air		
14. Toxicity: a. Groundwater b. Surface water c. Air		

DRAFT

	SOURCE	INFORMATION
15. Water use: a. Groundwater use b. Surface water use		
16. Persistence: a. Groundwater b. Surface water		
17. Population Served: a. By ground-water b. By surface water		
GROUNDWATER ROUTE		
18. Depth to Aquifer of Concern:		
19. Net Precipi-tation: a. Net seasonal rainfall b. Evaporation c. Mean annual precipitation		

DRAFT

	SOURCE	INFORMATION
20. Permeability of Unsaturated Zone (cm/sec):		
21. Physical State of Waste:		
22. Waste quality (all hazardous substances):		
23. Groundwater Use (unusable, industrial, agricultural, drinking, alternative drinking water sources):		
24. Distance to Well (measured from hazardous substance to nearest well drawing from aquifer of concern):		
SURFACE WATER MIGRATION ROUTE		
25. Facility Slope:		
26. 1 Year 24 Hour Rainfall:		

	SOURCE	INFORMATION
27. Distance to Surface Water (from hazardous substance to nearest downhill body of surface water):		
28. Surface Water Use (i.e., not used, commercial or industrial, irrigation, drinking water):		
29. Distance to Sensitive Environment (from hazardous substance):		
30. Distance to Water Intake:		
AIR ROUTE		
31. Reactivity (NFPA classification):		
32. Incompatibility (are incompatible substances present? Do they pose a hazard):		
33. Population Within 4 Mile Radius:		

DRAFT

	SOURCE	INFORMATION
34. Land Use: (include distance to food processing or agricultural production):		
TRIAGE FACTORS		
35. Flood Plain Status (500 year, 100 year flood plains, frequently flooded areas):		
36. Estimated Number of People Residing and/or Working Near Site:		
37. Presence of Schools, Hospitals, Nursing Homes, Day Care Centers, or Other "Sensitive" Populations:		
38. Presence of Adverse Health Effects:		

39. Principal Contact (Name, agency, affiliation, phone number):

DRAFT

40. Incidents (Describe any spills or fire/explosion hazards):

41. Inspections (Date, type, by whom, recommendation):

42. Enforcement History (Date, type of action, requirements, outcome):

43. Recommendation (Include rationale/justification):

A. EPA Recommendation:

B. DHS Recommendation:

Preparer Name: _____

Date: _____

Supervisor Name: _____

Supervisor Signature: _____

CONTACT REPORT

AGENCY: Napa County Environmental Health

ADDRESS:

PERSON CONTACTED: Catherine Moody

PHONE NO.: (707) 253-4471

FROM: Al Wanger

TO: CERCLA File

DATE: 8/21/87

SUBJECT: History of closure activities at Ford Aerospace

The following information was gained from Ms. Moody:

Ms. Moody formerly worked for DHS and did inspect the Ford Aerospace storage facility at Fabian Way. However, she never did inspect the storage facility at East Meadow Circle. No paperwork was ever discovered in DHS files that would indicate that the facility had been closed properly. She suggested that I talk with Charlene Williams of DHS (Emeryville) who had worked in the Permits unit during the early 1980's.

CONTACT REPORT

AGENCY: Department of Health Services

ADDRESS: 5850 Shellmound, Emeryville

PERSON CONTACTED: Charlene Williams

PHONE NO.: (415) 540-3401

FROM: Al Wanger

TO: CERCLA File

DATE: 8/24/87

SUBJECT: Ford Aerospace closure

cc:

Ms. Williams stated that all of the early ISD's were basically "boiler plate" ISD's that were very general in scope and not site specific. Guidelines and regulations did not provide the detail that is found in the current permitting process. This was also true for the closure of facilities. Requirements for documentation were also not as rigid as they are today. However, Ms. Williams said that a closure inspection or sign-off would have been well documented and placed in the files. She was not able to find any documentation about the closure when she looked into the issue several years ago. She also felt that this was an issue that the RCRA Permits Unit should resolve for DHS.

CONTACT REPORT

AGENCY: Santa Clara County Department of Planning

ADDRESS:

PERSON CONTACTED: Cynthia Sievers

PHONE NO.: (408) 299-2521

FROM: Al Wanger

TO: CERCLA File

DATE: 9/14/87

SUBJECT: Ford Aerospace closure

cc:

Ms. Sievers said that the planning department had no files on the site. She suggested I contact Isao Kobashi, the Hazardous Waste Management Coordinator for Santa Clara County (299-2424) for information.

CONTACT REPORT

AGENCY: Ford Aerospace

ADDRESS:

PERSON CONTACTED: Glenn Tsukamoto

PHONE NO.: (415) 852-4012

FROM: Al Wanger

TO: CERCLA File

DATE: 9/15/87

SUBJECT: Ford Aerospace closure at East Meadow Circle facility

cc:

Mr. Tsukamoto returned my call to Dan Hernandez who was out of town. He said that Ford had nothing new on file about the closure. He would check for copies of documentation of closure that were sent to regulatory agencies.

CONTACT REPORT

AGENCY: Palo Alto Fire Department

ADDRESS:

PERSON CONTACTED: Dan Heiser

PHONE NO.: (415) 329-2324

FROM: Al Wanger

TO: CERCLA File

DATE: 9/15/87

SUBJECT: Ford Aerospace closure

cc:

Mr. Heiser found no information in the Fire Department files regarding the closure of Ford's East Meadow Circle facility. The file did contain some information on types of materials that were stored on site, and a violation for the improper storage of flammable liquids in August 1982. He indicated that during the time of the closure, there was no guidance for the proper closing of facilities from any agency, and no systematic approach for evaluating closures.

CONTACT REPORT

AGENCY: Ford Aerospace

ADDRESS:

PERSON CONTACTED: Dan Hernandez

PHONE NO.: (415)852-4012

FROM: Al Wanger

TO: CERCLA File

DATE: 9/18/87

SUBJECT: Ford Aerospace closure of East Meadow Circle facility

cc:

Mr. Hernandez provided the following information:

Ford Aerospace complied with RCRA requirements for hazardous waste management. In 1981, Ford established a central storage facility at the East Meadow Circle for handling hazardous wastes. Wastes were stored in the back portion of the property in drums that were segregated by waste type and surrounded by sandbag diking.

Blake Spears of DHS had been involved in the development of the ISD and later the closure plan for the storage facility. Mr. Hernandez stated that he believed that Blake Spears and either Amy Zimpfer or Suzie Jackson of the EPA had done the closure inspection. He further stated that Mike Pardee of DHS had also inspected the facility in 1986 and had told him that there was no problem with the site.

He also said that Ford had submitted all the necessary documentation for closure. However, because of an internal policy of Ford Aerospace that requires the destruction of old inactive files after three years, copies of the closure documents could not be provided. Mr. Hernandez said he would check all files to see if there was a chance that a copy still remained of the closure documents.

(Suzie Jackson and Blake Spears have left DHS and could not be reached for comment)

CONTACT REPORT

AGENCY: U.S. Environmental Protection Agency Region IX

ADDRESS:

PERSON CONTACTED: Amy Zimpfer

PHONE NO.: (415) 974-8603

FROM: Al Wanger

TO: CERCLA File

DATE: 9/29/87

SUBJECT: Ford Aerospace closure

cc:

Ms. Zimpfer stated that she did not begin working at DHS until August 1982, several months after the East Meadow Circle facility had been closed. She said that although she never visited the East Meadow Circle facility, she did conduct an inspection at Ford's new storage facility located on Fabian Way. Ms. Zimpfer participated in the initial inspection for the Fabian Way facility. This may have confused Dan Hernandez when he thought that she had done the closure inspection of the East Meadow Circle facility.

CONTACT REPORT

AGENCY: Department of Health Services
Abandoned Site Program

ADDRESS:

PERSON CONTACTED: Mike Pardee

PHONE NO.: (916) 445-1803

FROM: Al Wanger

TO: CERCLA File

DATE: 9/29/87

SUBJECT: Ford Aerospace closure

cc:

Mr. Pardee said that he did an inspection of the Fabian Way facility during a preliminary assessment (PA) and found no problems at that site based on the criteria of the PA. However, he stated that he did not do an on-site inspection of the East Meadow Circle facility, and did not give a sign-off for closure of the facility. He also stated that during the initial PA of the East Meadow Circle facility, he could not find any evidence that a proper closure had been verified by DHS and had recommended a "pending" status until the Permits Units of DHS had dealt with the closure questions.

REFERENCE #1

DRAFT

PRELIMINARY ASSESSMENT SUMMARY

CAD980673925
FORD AEROSPACE CORPORATION
1036 E. Meadow Circle
Palo Alto, California 94303

June 1986

M.P.

Preparer: Michael Pardee
Toxic Substances Control Division
Site Cleanup and Emergency Response
(916) 324-1803

PROBLEM AND HISTORY

Ford Aerospace Corporation has leased this site from California Pacific Corporation since 1965. The site is currently used as a machine shop, sheet metal fabrication and accumulation point for hazardous waste from other buildings in the vicinity. Wastes are stored in 55 gallon drums until transported to Building 4 at Ford's main facility (addressed in another Preliminary Assessment) two blocks away at 3939 Fabian Way. Between 1980 and 1982, Ford used the site at 1036 E. Meadow Circle (Building 12) as a hazardous waste storage facility. The Department of Health Services (DHS) issued an Interim Status Document for this facility December 16, 1981. Ford Aerospace also submitted a Part A application for the Meadow Circle site to the Environmental Protection Agency. Ford Aerospace closed the Meadow Circle site (Bldg. 12) as a hazardous waste storage facility in early 1982 and the Department rescinded the ISD.

According to Catherine Moody from DHS, there is some question whether this site was properly closed in 1982. There is reference to some decontamination procedures performed by IT Corporation, such as detergent and steam cleaning of the site. However, part of the closure must consist of an evaluation by a registered professional engineer from outside the company. No documentation has been located that this evaluation occurred. The Department is currently in the process of ensuring Ford Aerospace has properly closed the site.

RECOMMENDATION

Ford Aerospace utilized this site as a hazardous waste storage facility between 1980 and 1982 under a Interim Status Document. No documentation has been found showing this facility went through proper post-closure procedures. Staff recommends pending status until this has been resolved by the DHS.

PRELIMINARY ASSESSMENT
Region 9

Preparer's Name Michael Pardee MP Date June 1986

	SOURCE	INFORMATION
1. Site ID Number	ERRIS	CAD980673925
2. Site Name	ERRIS	Ford Aerospace
3. Site Location	ERRIS	1036 E. Meadow Circle Palo Alto, CA 94303
4. County	ASAP Drive-by 12/04/85	Santa Clara
5. Owner (Address & telephone no.)	Phone Contact Dan Hernandez Ford Aerospace (415) 852-4012	California Pacific Corporation 2200 Sandhill Road Menlo Park, CA 94025 (415) 852-5104
6. Operator (Address & telephone no.)	Same as #5	Ford Aerospace and Communications 3939 Fabian Way Palo Alto, CA 94303 (415) 852-4012
7. Type of Ownership	Same as #5	Corporation
8. Status	Same as #5	Active
9. Source Activity	Same as #5	Formerly used to store hazardous wastes under ISD permit. Currently used as machine shop and sheet metal fabrication.
10. Years of Operation	Same as #5	1965-present
11. Facility Type	Letter From Ford to DHS Containing Annual Hazardous Waste Report 03/23/82	Drums
12. Waste Type and Description	Letter From Ford to DHS Containing Annual Hazardous Waste Report 03/23/82	Electroplating and Metal Finishing Solutions: Chromic Acid Hydrochloric Acid Sulfuric Acid Phospheric Acid Hydrofluoric Acid Nitric Acid Ferric Acid

PRELIMINARY ASSESSMENT
(Continuation Sheet)

ITEM NUMBER	SOURCE	INFORMATION
12. Waste Type and Description (continued)		Cyanide Compounds Machine Cutting Fluids Caustics: Soduim Hydroxide Potassuim Hydroxide Degreasing and Cleaning Solvents: Methylene Chloride 1-1-1-Trichloroethane Chlorofluoro Hydrocarbon Solvents: Etching Rinse Solvents: Xylene Isopropanol Methanol Acetone Methyl Ethyl Ketone Toluene Ethanol Photolithography Chemicals: Stoddard Solvent Cellosolve Acetate
	California Extremely Hazardous Waste Disposal Permit	Spent Floboric Acid Ammonium Diflouride Solution PCB Contaminated Material Used Light Ballast with PCB Polychlorinated Biphenyl

13. Contacts:

Dan Hernandez, Ford Aerospace, (415) 852-4012

Catherine Moody, DHS, (415) 540-3080

14. Incidents:

None documented in regulatory agency files checked.

Fire and Explosion___ Direct Contact___

15. Inspections:

12/04/85 DHS, Abandoned Site Program, Drive-by Inspection.
This site is located in a commercial park and is fenced and paved. No problems were observed.

08/31/81 Fire Inspection, Palo Alto Fire Department.
Remove PCB drums from building.

02/05/81 PCB Compliance, VERSAR for EPA.
PCB storage area not marked, diked, or protected from rainfall.
Drums not properly marked.

16. Enforcement History:

None documented in regulatory agency files checked.

17.a. Initial recommendation for further action:

Ford Aerospace utilized this site as a hazardous waste storage facility between 1980 and 1982 under ISD. No documentation has been found showing this facility went through proper closure procedures after it closed. Staff recommends pending status until this has been resolved by DHS.

17.b. EPA recommendation for further action:

18. Response Termination:___ No Further Action___ Pending___ Active

Justification:

DRAFT

	SOURCE	INFORMATION
19. Observed Release	Ford Aerospace files	no documented released
20. Depth to Aquifer	PA report Hillview-Porter	50 feet depth to shallow ground water aquifer
21. Net Precipitation Net seas. rainfall Evaporation	Calif. Rainfall Summary Evaporation data DWR	-5.36 inches 14.08 inches 19.44 inches
22. Permeability of Unsaturated Zone	PA report Hillview-Porter	Old San Francisco Bay mud 2.4 ft/day
23. Physical State	Letter from Ford to DHS 3/23/82	Liquid and Solid Metals
24. Containment (Ground Water)	EPA Haz Waste Site log and Inspection 2/5/81	70-80 Drums in sound condition. No liner. Also a pile of lighting ballast capasitors
25. Toxicity	SAX	PCB = 3 Toluene = 3 HCL = 3 Nitric Acid = 3
26. Persistence	SAX	Methyl Chloride = 2 PCB = 3 Acetone - non-persist Methanol - " "
27. Waste Quantity	Annual Report Haz. Waste Facil. Activities Jan.1-Dec. 31, 1981	13,845 gal/year in 1981
28. Ground Water Use	RP/FI for EFAB Santa Clara	Domestic and industrial purposes
29. Distance to Well	EPA Map of Wells in Santa Clara Valley	One municipal water supply well is located 6280 ft up gradient from site. 139+ 5 ground water monitoring wells are within 1 mile radius
30. Population Served (by Ground Water)	Summary of ground water supply data Santa Clara Valley, 1984	City of Palo Alto 0% served City of E. Palo Alto 100% 2,375 City of Mountain View 13% 60,000

	SOURCE	INFORMATION
31. Facility Slope	Site Drive By	0-2% "flat"
32. 1 yr. 24 hr. rainfall	National Climatalogical Center	3+ inches
33. Distance to Surface Water	Photo of site and EPA Inspection 2/81	30ft
34. Containment (Surface Water)	Inspection 2/5/81	Banks of Adobe Creek Diked to 6ft. Above storage area. Asphalt ground cover. No protection from rainfall
35. Surface Water Use	Izabel S. Gloege Santa Clara Valley Water Dist.	Adobe Creek is intermittent, no domestic, commercial, or industrial use.
36. Distance to Sensitive Environment	county map	Mountain View SHoreline park within 1 mile radius
37. Population Served (by Surface Water)	Izabel S. Gloege Santa Clara Valley Water Dist.	No population served
38. Distance to Water Intake	N/A	N/A
39. Reactivity	HRS USER'S Manual	Sulfuric Acid
40. Incompatibility	"	Caustics incomp /acid and solvents Cyanide " " " "
41. Toxicity (Air)	"	Cyanide, methyl chloride toxic by air pathwyay
42. Population within 4 mile radius	San Mateo & Santa Clara Census Tract Maps	150,456
43. Land Use	Site drive-by	Commercial Parl w/ other Ford buildings

REFERENCE #2

Ford Aerospace &
Communications Corporation
Western Development
Laboratories Division

3939 Fabian Way
Palo Alto, California 94303

May 20, 1980

Mr. John C. Blasco
Regional Office Permit Coordinator
California Department of Health Services
Hazardous Materials Management Section
2151 Berkeley Way
Berkeley, CA 94704

Subject: Application for Operating Permit for
Facilities Receiving Hazardous Wastes

Dear Mr. Blasco:

Attached is an "Application for Operating Permit for Facilities Receiving Hazardous Waste", for our proposed covered storage facility.

The facility is presently under review by the City of Palo Alto Architectural Review Board. We cannot provide you with final drawings or an operations plan until the design and location are approved by the City of Palo Alto. Consequently, in order to obtain a permit or waiver from the Regional Water Quality Control Board, we must also submit an operations plan.

As per my conversation with Dr. Paul Williams of your office on 5/15/80, we are submitting the application form with attachments to follow later, in order to meet the May 28, 1980 deadline.

If you have any questions, please contact me on 494-7400, extension 4976.

Very truly yours,

FORD Aerospace & Communications Corporation
WDL Division

J. E. Healy
Division Safety Engineer

JEH:mao

attachment

State of C
Departme.

APPLICATION FOR
OPERATING PERMIT FOR FACILITIES RECEIVING HAZARDOUS WASTE
(Document 1)

Application for: (1)	Facility Permit Number (2)	County Assessor's Parcel Number(s) (3)
1. ☒ Operating Permit 2. ☐ Modification of Permit ☐ Change in Design ☐ Change in Operation ☐ Change in Ownership/ Operator	41-0001-80 Date Received May 29, 1980 Date Permit Issued	127-10-094 Geographical Location of Facility (4) Section 8 Range 2 West Township 6 South Principal Meridian Mt.Diablo

Name and Street Address of Facility (5)	OPERATOR (6)
Ford Aerospace & Communications Corp. 1036 East Meadow Circle Palo Alto, California 94303 Telephone (415) 494-7400	Name and Address of Business Operating Facility Ford Aerospace & Communications Corp. 3939 Fabian Way Palo Alto, CA 94303 Telephone (415) 494-7400
Name and Mailing Address of Legal Owner of Facility (7) California Pacific Commercial Corp. 1000 Welch Road Palo Alto, CA 94304 Telephone (415) 321-1740	Type of Business Operating Facility ☐ Sole Proprietorship ☒ Corporation ☐ Partnership ☐ Government Agency Name and Address of Owner(s) of Business Operating Facility (Must be address where legal notice may be served.) Ford Aerospace & Communications Corp. 3939 Fabian Way Palo Alto, CA 94303 Telephone (415) 494-7400
Type of Facility (Check all appropriate boxes) (8) ☐ Landfill ☒ Storage ☐ Pond ☐ Composting ☐ Resource Recovery ☐ Injection Well ☐ Transfer Station ☐ Other _____ specify	Type of Wastes Received (Check all appropriate boxes and/or consult Sec. 60281 & 60283, Title 22, Calif. Adm. Code for additional names of hazardous wastes.) (9) ☒ Acid solution ☒ Solvent ☒ Oil ☒ Alkaline solution ☐ Tetraethyl lead sludge ☐ Drilling mud ☐ Pesticides ☐ Chemical toilet wastes ☐ Contaminated soil and sand ☐ Paint sludge ☐ Tank bottom sediment Other: Cyanides
Does the public use the facility? ☐ Yes ☒ No (10)	

(11) Attach a list of regulatory agencies having jurisdiction over the Facility. Include any permit numbers where appropriate.

(12) I hereby certify that the information provided in this application and in the attachments (listed below) is true and accurate to the best of my knowledge. Attachments:

Signature of Owner (13)	Signature of Operator (14)
John E. Healy	John E. Healy
Printed or Typed Name John E. Healy	Printed or Typed Name John E. Healy
Title Division Safety Engineer Date May 27, 1980	Title Division Safety Engineer Date May 27, 1980

Signature of Reviewer (15)	Signature of Reviewer (16)
County Health Department	CALIFORNIA STATE DEPARTMENT OF HEALTH
Printed or Typed Name	Printed or Typed Name
Title Date	Title Date

EH 188 (12/77)

FORM 1 GENERAL — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: C A D 0 0 0 0 3 0 5 2 8

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

CAD000030528

FORD Aerospace & Comm. Corp. WDL Division

~~AEROSPACE FORD CORPORATION~~

~~3939 FABIAN WAY~~ 3939 FABIAN WAY

~~PALO ALTO, CA 94303~~ PALO ALTO, CA 94303

~~3939 FABIAN WAY~~ 1036 EAST Meadow Circle

~~PALO ALTO, CA 94303~~ PALO ALTO, CA 94303

19 NOV 1980

II. POLLUTANT CHARACTE

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: FORD AEROSPACE & COMM. CORP. WDL Div.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 HERNANDEZ DAN IND HYGIENE	415 494 7400

5089 Ex 5874 4984

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 3939 FABIAN WAY

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 PALO ALTO	CA	94303

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1036 EAST MEADOW CIRCLE

B. COUNTY NAME

SANTA CLARA

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 PALO ALTO	CA	94303	085

CONTINUE ON REVE

II. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3662 (specify) Electrical/Electronic Mfg.	7 (specify)
C. THIRD	**D. FOURTH**
(specify)	7 (specify)

III. OPERATOR INFORMATION

A. NAME: FORD AEROSPACE AND COMMUNICATIONS CORP.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 313 568 7660

E. STREET OR P.O. BOX: 3342 RENCEN 300 TOWR

F. CITY OR TOWN: DETROIT

G. STATE: MI

H. ZIP CODE: 48243

IX. INDIAN LAND
Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 3 N	D. PSD (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	E. OTHER (specify): 9 (specify)
C. RCRA (Hazardous Wastes): 9 R	E. OTHER (specify): 9 (specify)

F9: A/50

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS

F9: A/51

Aerospace and Electronics Manufacturing

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
K. L. Rose, Vice President and General Manager- WDL Division	K L Rose	11/18/80

COMMENTS FOR OFFICIAL USE ONLY

C

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This in ...ia ...s required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12
C	A	D	0	0	0	0	3	0	5	2	8

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (31)

[ ] 2. NEW FACILITY *(Complete item below.)* (31)

C 8 (15)

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
61 (73-74)	12 (75-76)	30 (77-78)

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
(73-74)	(75-76)	(77-78)

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

14		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	10,000	G		7				
2					8				
3					9				
4					10				

PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

- ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

- UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

- PROCESSES
  1. PROCESS CODES:
     For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
     For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
     Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
  2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W C A D 0 0 0 0 3 0 5 2 8 | | 1

FOR OFFICIAL USE ONLY: W DUP | 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 0 1	14500	P	S 0 1	
2	F 0 0 2	275	P	S 0 1	
3	F 0 0 3	7900	P	S 0 1	
4	F 0 0 5	11100	P	S 0 1	
5	F 0 0 7	3980	P	S 0 1	
6	F 0 0 9	24900	P	S 0 1	
7	F 0 1 7	3000	P	S 0 1	
8	D 0 0 0	4297	P	S 0 1	
9	D 0 0 2				Included with above
10	D 0 0 0	6820	P	S 0 1	
11	D 0 0 1	950	P	S 0 1	
12	D 0 0 0				Included with above
13	D 0 0 3	100	P	S 0 1	
14	D 0 0 0				Included with above
15	P 0 1 2	1	P	S 0 1	
16	P 0 3 0	10	P	S 0 1	
17	P 0 5 6	1	P	S 0 1	
18	U 0 1 9	25	P	S 0 1	
19	U 0 2 1	1	P	S 0 1	
20	U 0 5 2	2	P	S 0 1	
21	U 0 7 7	30	P	S 0 1	
22	U 1 0 3	1	P	S 0 1	
23	U 1 3 3	1	P	S 0 1	
24	U 1 3 1	1	P	S 0 1	
25	U 1 3 5	1	P	S 0 1	
26	U 1 4 7	1	P	S 0 1	

V. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*														
C	A	D	0	0	0	0	3	0	5	2	8			6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
37 25 58 N	122 06 09 W

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
K. L. Rose, Vice President & General Manager - WDL Division	K L Rose	11/18/80

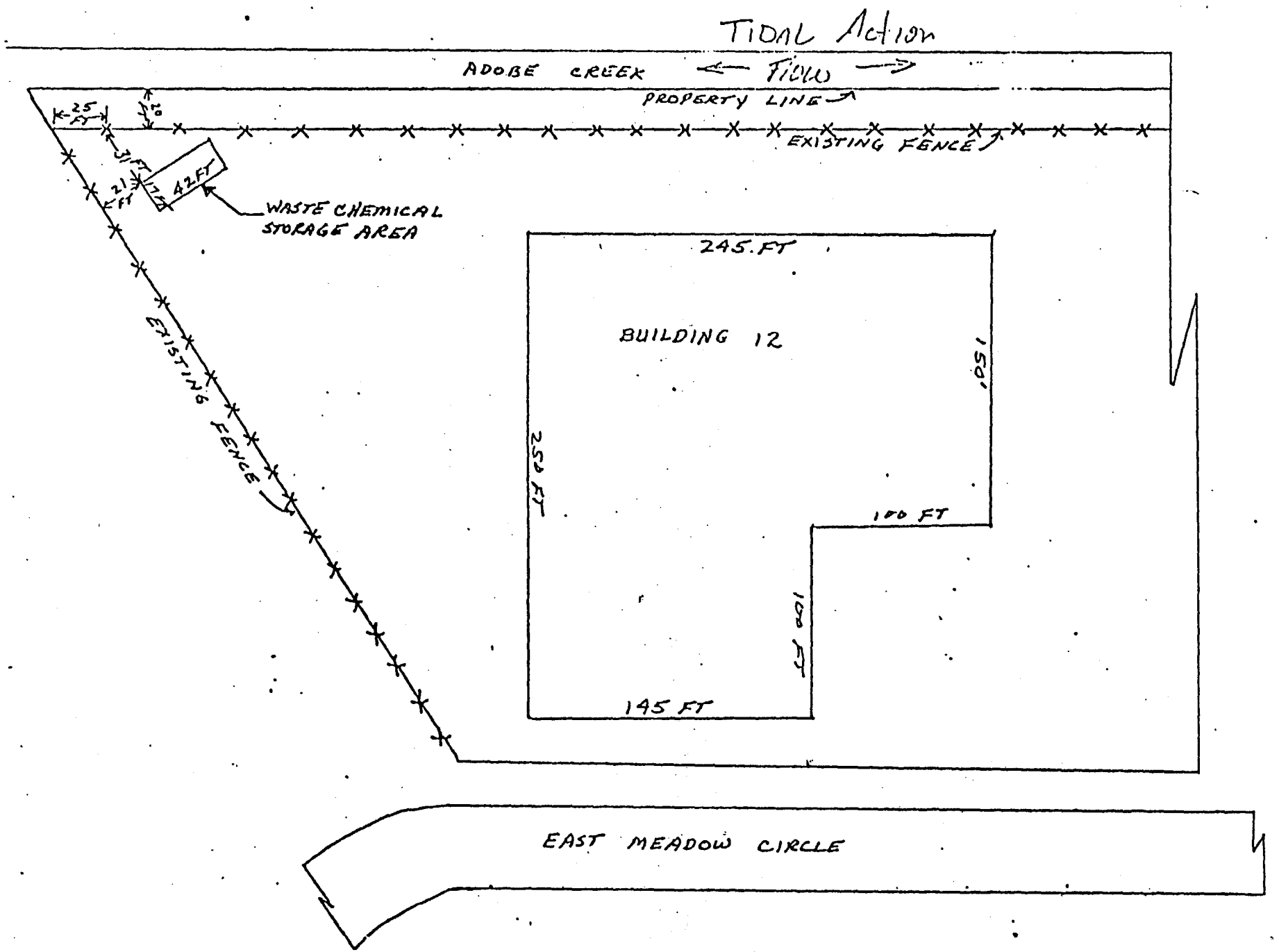
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

IV. DESCRIPTION OF HAZARDOUS WASTE (Cont'd)

U162	1 lb.	S01
U167	1 lb.	S01
U190	1 lb.	S01
U201	1 lb.	S01
U219	1 lb.	S01



APPROXIMATE SCALE: 1 INCH = 75 FT

REFERENCE #3

Ford Aerospace &
Communications Corporation
Western Development
Laboratories Division

3939 Fabian Way
Palo Alto, California 94303-9981

March 19, 1986

Mike Pardee
Department of Health
Toxics Division
714-744 P Street
Sacramento, California 95814

Dear Mr. Pardee:

Attached for your information is the PCB inspection we discussed.

Sincerely,

D. W. Hernandez
Supervisor, Environmental
Health & Safety

Attachment
cc: File

File E.9 - Inspection

A09

REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH THE PCB DISPOSAL AND MARKING REGULATIONS

FORD AEROSPACE
1036 EAST MEADOW CIRCLE
PALO ALTO, CALIFORNIA 94303

February 5, 1981

PERFORMED FOR:

U.S. ENVIRONMENTAL PROTECTION AGENCY
SURVEILLANCE AND ANALYSIS DIVISION
215 FREMONT STREET
SAN FRANCISCO, CALIFORNIA 94105

PERFORMED BY:

VERSAR, INC.
6621 ELECTRONIC DRIVE
SPRINGFIELD, VIRGINIA 22151

Objective

The purpose of this inspection was to document Ford Aerospace's compliance with Federal PCB Disposal and Marking Regulations (40 CFR 761) published in Part VI of the Federal Register on May 31, 1979. The specific objective was to respond to a complaint of improper PCB storage and to verify existing conditions.

I. Facility and Responsible Official Identification

Ford Aerospace
1036 East Meadow Circle
Palo Alto, California 94303

Dan Hernandez
Industrial Hygienist (415) 494-7400

II. Inspection Date and Participants

February 5, 1981

Ford Aerospace - Dan Hernandez, Industrial Hygienist
John E. Healy, Division Safety Engineer
R.J. (Jack) Williams, Supervisor, Safety and Employee Program
Daniel Todd, Facilities Engineer
Jack L. Uvodich, Supervisor Plant Engineering Section

U.S. Environmental Protection Agency - Dan Horgan, Consumer Safety Officer

Versar, Inc. - William B. Leedy, Compliance Auditor
James Foster, Compliance Auditor

III. Findings

Ford Aerospace currently has one out-of-service large PCB low-voltage capacitor, and two DOT-approved drums (No. 8 and No. 10) containing a total of 193 used lighting fixture ballast small PCB capacitors. The PCB capacitor and the two drums containing the 193 spent ballast capacitors were located in a PCB storage area which was not marked, diked, or protected from rainfall. (See photographs No. 1, 2 and 3 in Attachment A).

The large, PCB capacitor was positioned inside a wooden packing crate and was not marked. This capacitor was not visibly damaged.

The two drums containing the ballast capacitors had the letters PCB stenciled on them; however, they were not properly marked with the M_L PCB labeling. A leaking lighting fixture ballast capacitor was observed in drum No. 8 and a sample was collected for PCB analysis. (See photographs No. 5 and 6). This leakage was found to contain no detectable concentrations of PCBs. Approximately forty additional lighting ballast PCB small capacitors, still in the fixture housing, were stored in the storage yard (See photographs No. 7, 8, and 9). A substance which had apparently leaked from one of these PCB small capacitors and dried was sampled. PCB analytical results indicate PCB, Aroclor 1254, present in this solid material. Since the volume of weight of material collected could not be accurately quantified for some samples, analytical results for these samples are only qualitative.

TABLE 1. PCB SAMPLE ANALYSIS FROM FORD AEROSPACE

Sample Number	Description	Aroclor Type	PCB/ppm
01	Wipe sample from inside barrel of lighting ballast capacitors.	-	ND*
02	Asphalt from outside barrel.	-	ND*
03	Waste oil from drum.	-	<1
04	Material from ballast capacitor.	1254	*

*Qualitative Analysis Only.

IV. Facility Description

The Ford Aerospace facility currently is involved in telecommunications research mostly for Federal Government contracts. This facility occupies 50 acres and has been in business for 20 years. Ford Aerospace currently employs 5000 people.

V. Inspection Summary

The inspection team arrived at the Ford Aerospace facility, 3939 Fabian Way, Palo Alto, California, on the morning of February 5, 1981. Inspectors presented their credentials, and the "Notice of Inspection" and "Confidentality Notice," to Mr. Dan Hernandez. Mr. Hernandez suggested that the inspection team then proceed to a conference room to discuss the intent of the inspection. The inspectors met with Messrs. Hernandez, Todd, Williams, Healy, and Uvodich. The "Notice of Inspection" and "Confidentality Notice" were signed during this meeting by Mr. Hernandez. The following information was obtained during the meeting:

1. The in-service PCB inventory consisted of numerous small lighting fixture ballast capacitors used in the fluorescent lighting in the company's offices.

2. All electricity at the Ford Aerospace facility is supplied by the City of Palo Alto.

3. The out-of-service PCB inventory consisted of one large low voltage PCB capacitor and two 55-gallon, DOT-approved drums containing used small lighting fixture ballast capacitors. These PCB articles are stored at the 1036 East Meadow Circle facility.

4. A California Liquid Waste Hauler Record, presented by Dan Hernandez (See Attachment 1), indicates that Ford Aerospace disposed of seven 55-gallon, DOT-approved drums filled with lighting fixture ballast capacitors; and a transformer capacitor on September 29, 1980. These drums were transported to Casmalia Disposal, Santa Barbara, California, via Erickson Trucking Inc., located at 255 Parr Boulevard, Richmond, California, 94801.

5. Ford Aerospace currently maintains a chemical waste spill plan (See Attachment 2).

The inspection team then proceeded to the storage site located at 1036 East Meadow Circle in Palo Alto. The PCB storage area contained: thirty 55-gallon drums with the letters PCB stenciled on them, and one 12 ft x 18 ft x 24 ft wooden packing crate with no labeling or stenciling. Only two of the thirty 55-gallon drums (No. 8 and No. 10) contained PCB light ballast capacitors; the remainder were empty. The packing crate contained a large low voltage structurally undamaged PCB capacitor. Neither the drums or this capacitor were properly marked as PCB items. The PCB storage area was located next to an eight-foot fence and was not diked, properly marked, or protected from rainfall. This storage area was located approximately 30 feet from Adobe Creek. It was also noted that the banks of Adobe Creek were diked to about six feet above the storage area (See photograph No. 4).

The inspectors then examined the contents of the two full 55-gallon drums of PCB small light ballast capacitors and the packing crate containing the PCB large low voltage capacitor. Some of the small light ballast capacitors in drum No. 8 had been leaking and a sample was taken. A solid substance resembling tar was observed on the outside of one of the barrels. This substance was sampled. The large, low-voltage PCB capacitor located inside the packing crate was identified as an Axel Electronics Capacitor containing 37.74 lbs of PCB dielectric fluid.

PCB records were produced by Mr. Healy in the form of a file memo, dated November 30, 1979, and an inventory of the PCB items contained in the two 55-gallon drums (See Attachments No. 3 and No. 4).

According to this drum inventory, Ford Aerospace currently has 193 small light ballast capacitors contained in these two drums. Mr. Healy presented a purchase order dated April 23, 1980 (See Attachment No. 5) for the disposal of this Axel Electronics Capacitor, but at the time of the inspection, it has still not been disposed of.

The inspection team then inspected the grounds adjacent to the storage area. The inspectors found approximately 40 additional light ballast capacitors still in their housing.

The exact number could not be determined because of their location in the pile. According to Mr. Healy, these units are being stored for resale to company personnel (See photographs No. 7, 8, and 9). A sample for PCB analysis was taken from a leakage of one of the lighting ballast capacitors still in a housing.

Waste oils from machine shops were stored in 55-gallon drums and placed adjacent to other hazardous wastes. There were six drums present. It was noted that not all of the drums were full. Waste oil is disposed of through Kettleman Waste Disposal to Oscar E. Ericman Inc., Richmond, California. A sample of waste oil was taken for PCB analysis (See photographs No. 10 and 11).

ATTACHMENTS

FORD AEROSPACE
1036 EAST MEADOW CIRCLE
PALO ALTO, CALIFORNIA 94303

List of Attachments for Facility:

A. List of Photographs
B. U.S. EPA Complaint of Improper PCB Liquid Disposal
C. PCB Analytical Report
D. Chain of Custody Record
E. Receipt for Samples and Documents Taken from Facility.
F. Notice of Inspection.
G. Confidentiality Notice

List of Attachments Received from Facility:

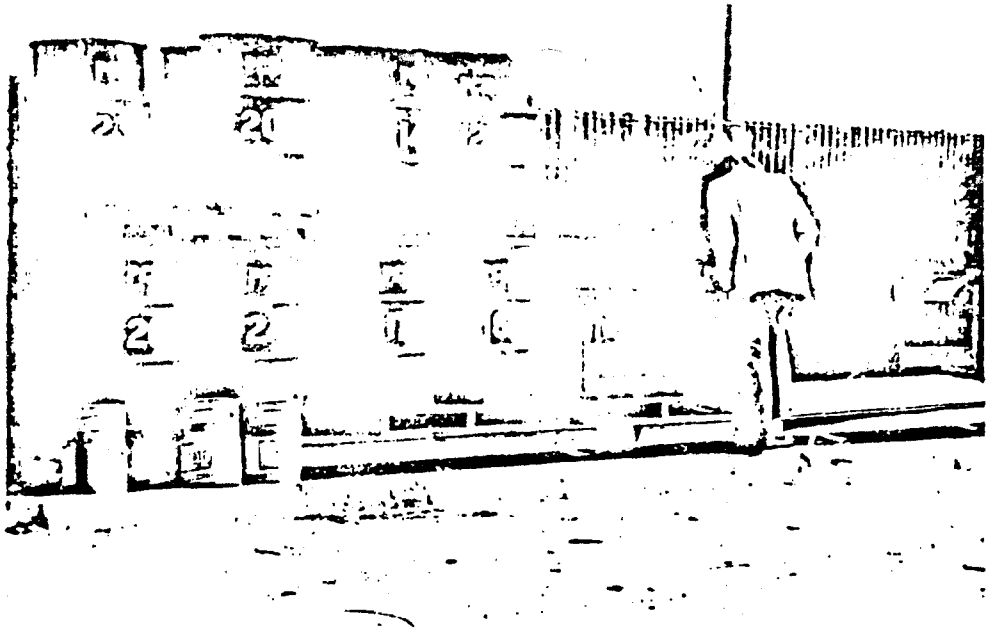
1. California Liquid Waste Hauler Record
2. Ford Aerospace - Chemical Waste Spill Plan
3. Disposal of PCB Capacitor Memo to Fill Dated November 30, 1979.
4. PCB Capacitor Inventory in Storage
5. Purchase Order Dated April 13, 1980

ATTACHMENT A

Photographs

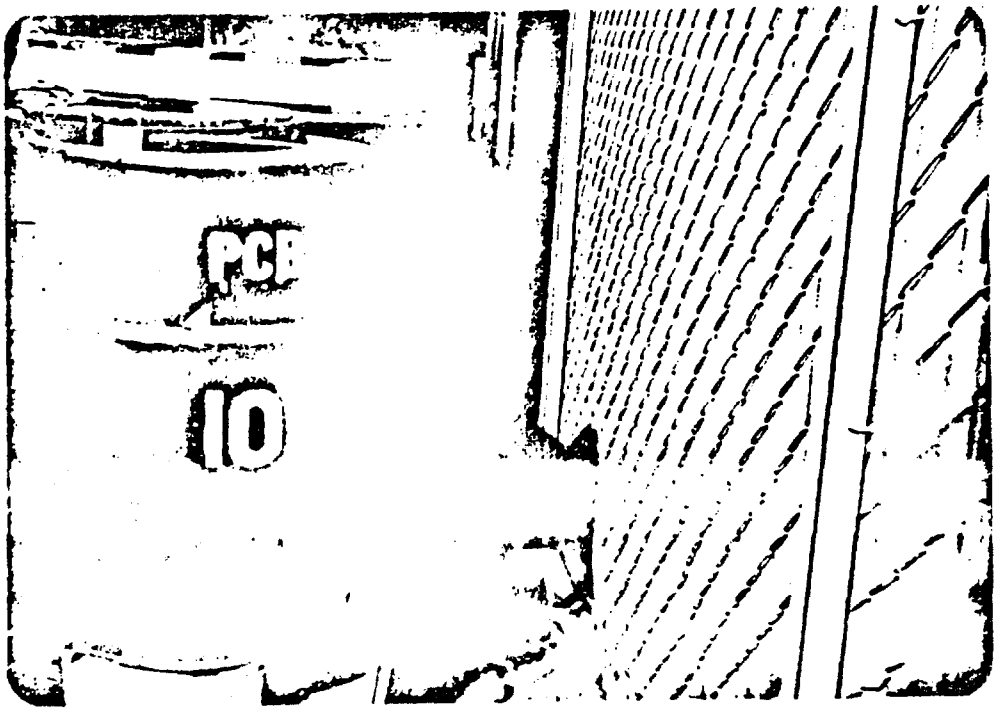
FORD AEROSPACE
1036 EAST MEADOW CIRCLE
PALO ALTO, CALIFORNIA 94303

1. PCB storage area
2. PCB storage area, sampling storage drum No. 8
3. The backside of the PCB storage area
4. Adobe creek adjacent to Ford Aerospace's PCB storage area
5. PCB lighting ballast capacitors inside drum No. 8
6. PCB lighting ballast capacitors inside drum No. 8.
7. PCB lighting ballast capacitors still in housing.
8. PCB lighting ballast capacitors still in housing.
9. PCB lighting ballast capacitors still in housing.
10. Sampling waste oil drum.
11. Sampling waste oil drum.

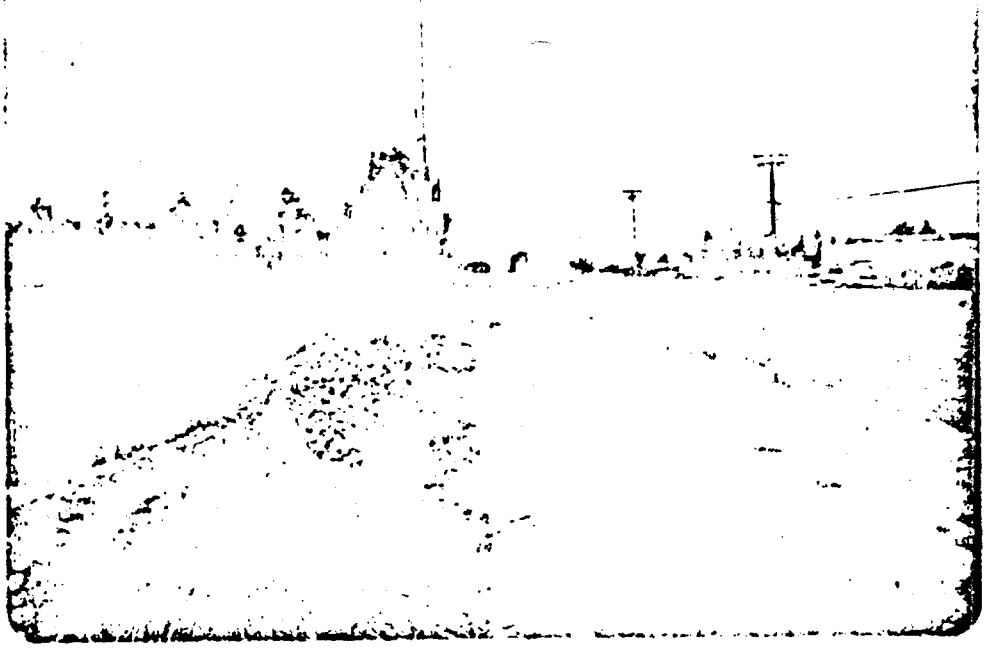


Photograph No. 1: The Ford Aerospace PCB storage area.

Photograph No. 2: The Ford Aerospace PCB storage area with James Foster sampling storage drum No. 8.

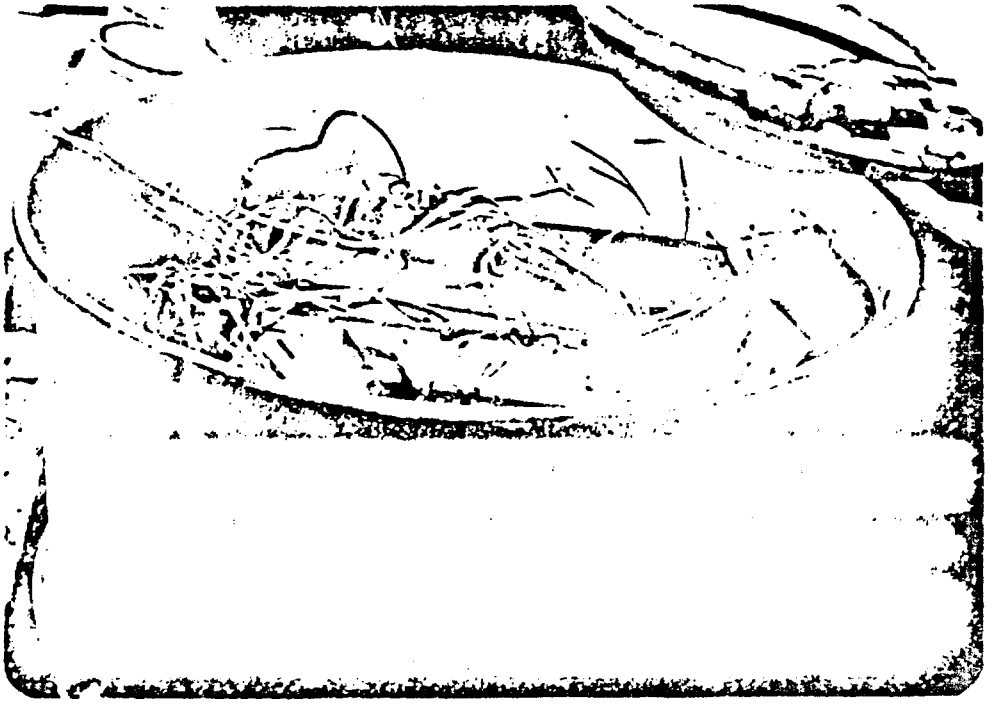


Photograph No. 3: The backside of the PCB storage area at Ford Aerospace. This shows no continuous curbing at the back of the PCB storage area.



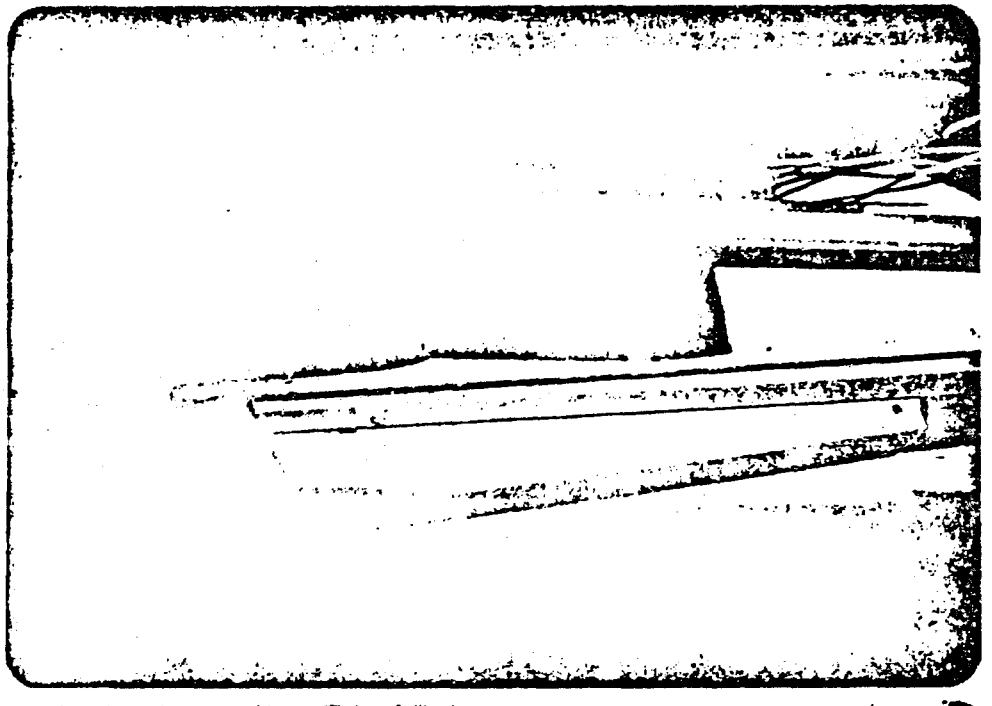
Photograph No. 4: Adobe Creek adjacent to the PCB storage area at Ford Aerospace.

Photograph No. 5: PCB lighting ballast small capacitors in drum No. 8.

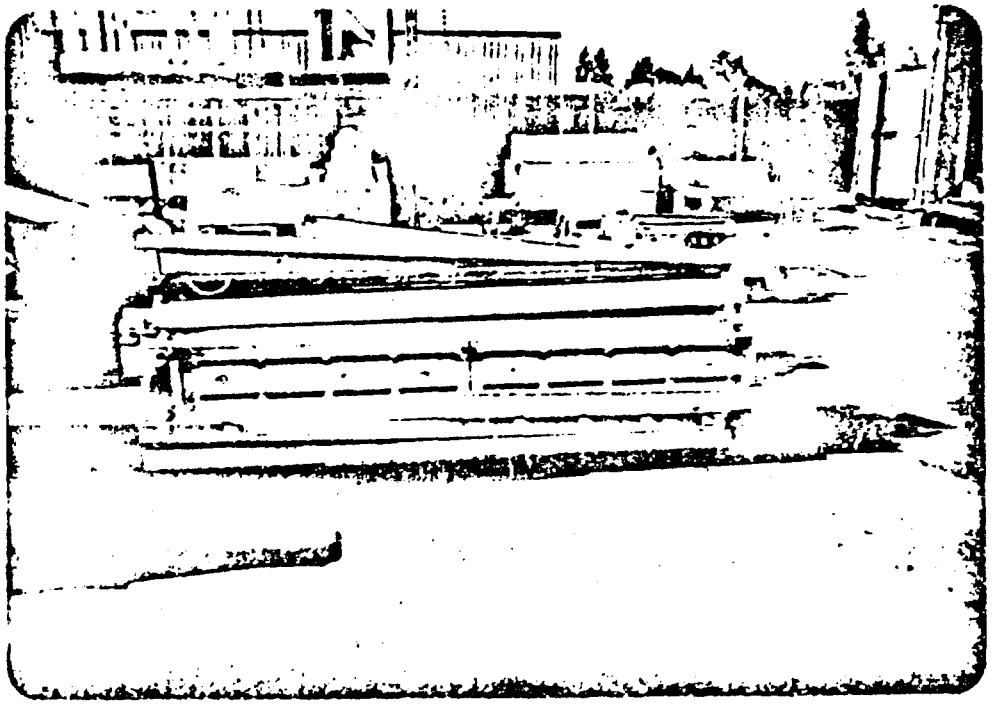


Photograph No. 6: PCB lighting ballast capacitors in drum No. 8.

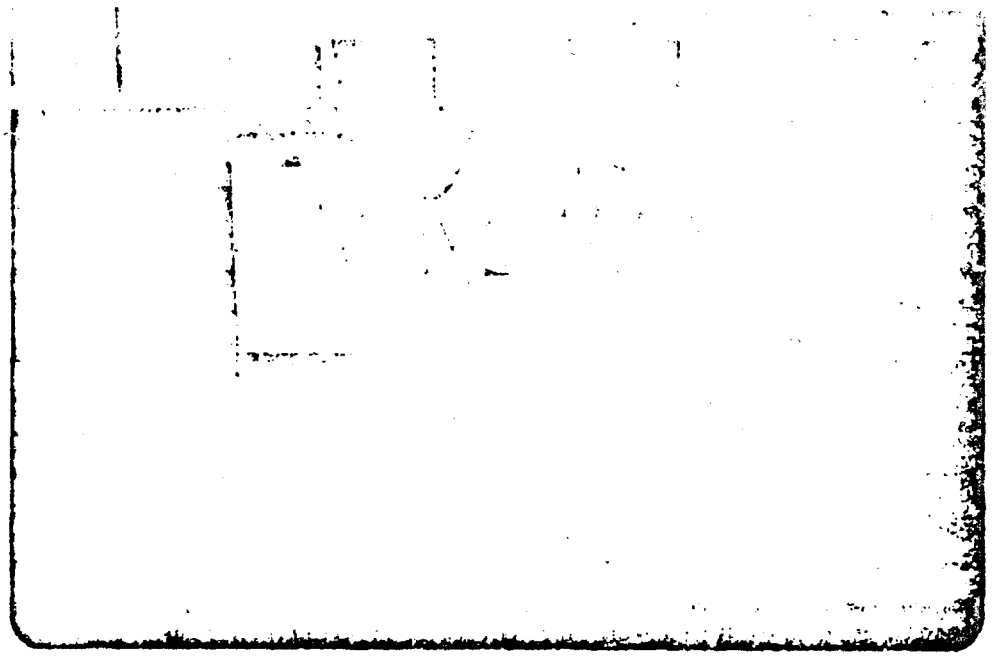
Photograph No. 7: PCB small lighting ballast capacitors still in fixture housing.



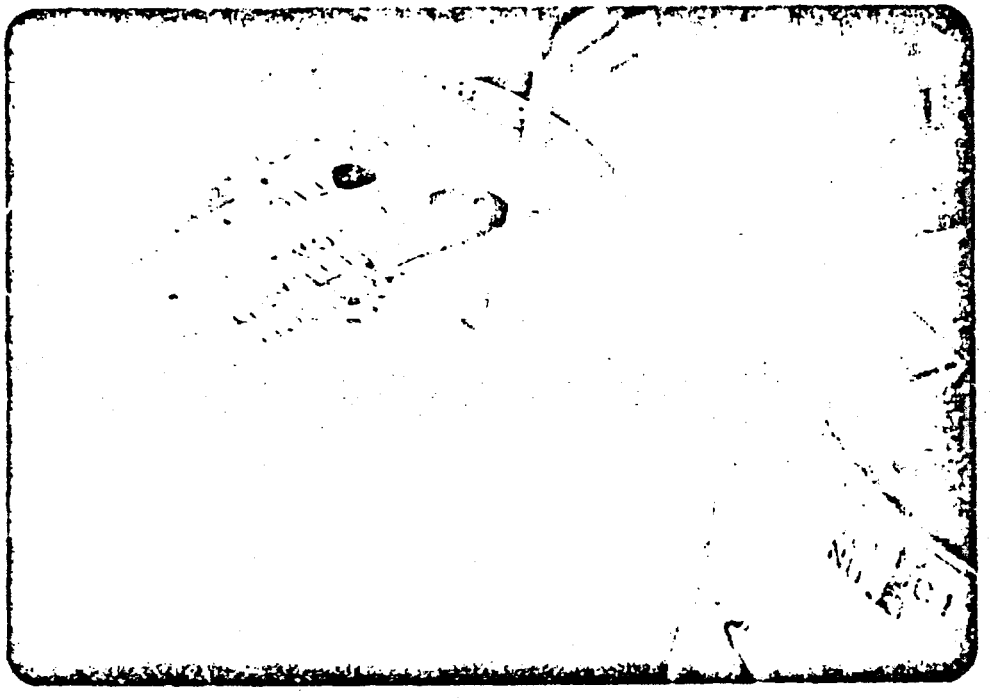
Photograph No. 8: Close-up view of lighting ballast capacitors still in housing. Notice the leakage on capacitor.



Photograph No. 9: PCB small lighting ballast capacitors still in fixture housing.



Photograph No. 10:
Sampling waste oil drum.



Photograph No. 11:
Sampling waste oil drum.

B

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSIO. ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)
(Record of item checked above)

TO:	FROM:	DATE
Gavin A-3-2	Bob Brown City of Palo Alto	17 Sept 80 TIME 9 am

SUBJECT

Complaint of improper PCB liquid storage

SUMMARY OF COMMUNICATION

Mr. Brown is an environmental planner for the City of Palo Alto. He called me to complain about the fact that Ford Aerospace may be improperly storing PCB liquid wastes on their property. According to Brown, there are approximately 70-80 55-gallon drums of PCB stacked three high in an asphalt lot on Ford's property. In addition, the site is located thirty feet from Adobe Creek. The drums do not have EPA PCB caution labels attatched to them and instead just have the letters "PCB" painted on them. Brown asked if there was anything EPA could do about the situation and I told him that his report would be referred to our Enforcement Division. Ford's PCB site is located at 1036 East Meadow Circle in Palo Alto. Brown would like to be kept informed of any inspection or action that EPA might take.

Mr. Bob Brown
Planning Dept
250 Hamilton Ave
Palo Alto 94301
(415) 329 2149

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES

TO: ROD C. Susi J. Jim suher E-1

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-6 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

Versar inc.

PCB ANALYTICAL REPORT

PREPARED FOR:

REF. # 717.4

Mr. Jon Byroade

Facility Inspected: Ford Aerospace

SAMPLE NO.	LAB NO.	CONCENTRATION PARTS/MILLION	AROCLOR	COMMENTS
9-FD-01	9364*	ND	—	Wipe
9-FD-02	9365*	ND	—	Asphalt
9-FD-03	9366	<1	—	Waste Oil
9-FD-04	9367*	—	1254	Solid

*Qualitative Analysis Only

DATE: March 11 1991

Mark T. Carkhuff

MARK T. CARKHUFF, CHEMIST
APPLIED CHEMISTRY DIVISION

6621 ELECTRONIC DRIVE, SPRINGFIELD, VIRGINIA 22151 TELEPHONE: (703) 750-3000

EPA United States Environmental Protection Agency

Chain of Custody Record

09 1-01-84 7.7.3

Inspection Number: 09-5

Sample Name: Ford Rucker

Inspector Name and Address: James R FOSTER Dr 6621 Electronics Dr Springfield VA 22151

Date Sample: 2/8/81 | Time: 1145 | Duplicate Requested: ( ) Yes ( )

Inspector Signature: James R. Foster

Location of Sampling: 1036 East Meadow Circle Palo Alto CA

Analysis/Testing Required

Laboratory	Versar - G.C.		
Date Received	2/9/81		
Received By	Beverly Hutchins		
Sent Via	Envoy		
Sample Condition	intact		
Condition of Seals	intact		
Units Received	4		
Storage Location	ref.		
Assigned By	Mark Calabretta		
Assigned To	Roger Thomas		
Delivered By	—		
Date Delivered	—		
Number of Units Received	4		
Units Analyzed	4		
Date Seal Broken	01, 02, 04 03 2/16 2/27		
Date Resealed			
Resealed By			
Storage Location	Refrig.		
Date Results of Analysis Issued to EPA		Date Results of Analysis Issued to Facility	

Remarks

VERSAR Inc.

ANALYTICAL CHEMISTRY DIVISION

CHAIN OF CUSTODY RECORD

SAMPLE # 9-FD-01

LABORATORY # 9364

RECEIVED 2/9/81 (date) 11:00 (hours) (minutes)

RECEIVED BY Beverly Hutchins (print) Beverly Hutchins (signature)

PROJECT-PATCH # 717.4-1 SITE California

PARAMETER PCB MATRIX Wipe

Operation	Day/Time	Signature
From refrig	2/16/81	Roger Thomas
To refrig	2/16/81	Roger Thomas
(PCB florosil cleanup)		

[illegible] INC.

ANALYTICAL CHEMISTRY D[illegible]SION

CHAIN OF CUSTODY RECORD

SAMPLE # 9-FD-02

LABORATORY # 9365

RECEIVED 2/9/81 (date) 11:00 (hours) (minutes)

RECEIVED BY Beverly Hutchins (print) Beverly Hutchins (signature)

PROJECT-BATCH # 717.4-1 SITE Colorado

PARAMETER PCB MATRIX ASPHALT

Operation	Day/Time	Signature
From refrig.	2/16/81	Roger Thoma
To refrig.	2/16/81	Roger Thoma

ANALYTICAL CHEMISTRY DIVISION

CHAIN OF CUSTODY RECORD

SAMPLE # 9-FD-03

LABORATORY # 9366

RECEIVED 2/9/81 (date) 11:00 (hours) (minutes)

RECEIVED BY Beverly Hutchins (print) Beverly Hutchins (signature)

PROJECT-BATCH # 717.4-1 SITE California

PARAMETER PCB MATRIX Waste oil

Operation	Day/Time	Signature
Removed from refrig for PCB florobel cleanup	2/24/81	Roger Thomas
Returned to refrig	2/24/81	Roger Thomas

ANALYTICAL CHEMISTRY [illegible]SION

CHAIN OF CUSTODY RECORD

SAMPLE # 9-FD-04

LABORATORY # 9367

RECEIVED 2/9/81 (date) 11:00 (hours) (minutes)

RECEIVED BY Beverly Hutchins (print) Beverly Hutchins (signature)

PROJECT-BATCH # 717.4-1 SITE [illegible]

PARAMETER PCB MATRIX Solid

Operation	Day/Time	Signature
From refrig	2/16/81	Roger Thomas
To refrig	2/16/81	Roger Thomas
(PCB florosil cleanup)		

EPA United States Environmental Protection Agency

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector Name: James R Foster	Name of Firm: Ford Aerospace
Inspector Address: 6621 Electronics Dr, Springfield VA 22151	Firm Address: 1030 East Meadow Circle, Palo Alto CA
	Name of Individual:
	Title:

Date Collected	Duplicate Samples Requested and Received	Sample Numbers
2/5/81	( ) Yes (X) No	09-FA-01, 02

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt for the document(s) and/or sample(s) described is hereby acknowedged:

09-FA-01 - Wipe inside barrel of ballast

09-FA-02 - Wipe Asphalt outside barrel.

09-FA-03 waste oil drum

09-FA-04 ~~oil~~ material from ballast capacitor.

~~09-FA-05~~

Documents:

PCB disposal inventory dated 5/7/80 (4 pages)

Memo: Disposal of a capacitor containing PCB dated 12/21/79 (2 pages)

letter: Application for EHWOP dated May 12, 1980 (2 pages)

file memo: Conversation with Jerry Bowen dated 12/20/79.

Invoice Shipping Order - dated 4/23/80 (1 page)

Signature of Inspector	Signature of Owner, Operator, or Agent
James R Foster	
Title: Environmental Scientist	Title:

EPA United States Environmental Protection Agency

NOTICE OF INSPECTION

Inspector Name and Address: James R Foster Dr 6631 Electronics Springfield VA 22151	Name of Firm: Ford Aerospace Firm Address: 1036 East Meadow Circle Palo Alto CA
Inspector's Signature: James R Foster	Date: 2/5/81 Time:
Title: Environmental Scientist	Name and Title of Recipient: Signature of Recipient:

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been compiled with.

☐ In addition, this inspection extends to (circle appropriate letters):

(A) Financial data
(B) Sales data
(C) Pricing data
(D) Personnel data
(E) Reserach data

The nature and extent of inspection of such data specified in A through E above as follows:

United States Environmental Protection Agency

TSCA Inspection Confidentiality Notice

Inspector Name: James P Foster William Beeson	Facility: Ford Aerospace
Inspector Address: 6621 Electronics Dr Springfield Virginia 22151	Facility Address: 1036 East Meadow Circle Palo Alto CA
	Chief Executive Officer of Firm: Don Hennick
	Title: Sr Industrial Hygienist
Name of Individual to Whom Notice Given:	Title:

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act, Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by means of the procedures, set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To Claim Confidential Information

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within two days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt-requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Chief Executive Officer within the seven-day period, will be treated by EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by facility official receiving this notice I have received and read this Notice.	If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
Name: Don Hennick	Name:
Title: Sr Industrial Hygienist	Title:
Signature:	Address:
Date:	

Meeting Attendance	Title
[illegible]	Supr. Plant Engineering Section
[illegible]	FACILITIES ENGINEER
Dan Hernandez	Industrial Hygiene, Toxicology
William B Leach	Environmental Scientist

Attachment No. 1

STATE DEPARTMENT OF HEALTH

PRODUCER OF WASTE (Must be filled by producer)

Name (print or type): FORD AEROSPACE — Code No.

Pick up Address: 1036 EAST MEADOW CIRCLE (Number) (Street) PALO ALTO (City)

Telephone Number: ( ) 494-7400 P.O. or Contract No.: CP 756520

Order Placed By: JACK HEALY Date: 9/25/80

Type of Process Which Produced Wastes: — Code No.
(Examples: metal plating, equipment cleaning, oil drilling-wastewater treatment, pickling bath, petroleum refining)

DESCRIPTION OF WASTE (Must be filled by producer)

Check type of wastes:

1. ☐ Acid solution
2. ☐ Alkaline solution
3. ☐ Pesticides
4. ☐ Paint sludge
5. ☐ Solvent
6. ☐ Tetraethyl lead sludge
7. ☐ Chemical toilet wastes
8. ☐ Tank bottom sediment
9. ☐ Oil
10. ☐ Drilling mud
11. ☐ Contaminated soil and sand
12. ☐ Cannery waste
13. ☐ Latex waste
14. ☐ Mud and water
15. ☐ Brine

☒ Other (Specify) [illegible] — Code No.

Components:
Examples: Hydrochloric acid, lime, caustic soda, phenolics, solvents (list), metals (list), organics (list), cyanide)

	Upper	Lower	Concentration: %	ppm
1. PCB [illegible]				
2.				
3. [illegible]				
4.				
5.				
6.				

DOT Proper Shipping Name: PCB

Proposed Destination: CASMALIA DISPOSAL SANTA BARBARA

Hazardous Properties of Waste:
pH ____ ☐ none ☒ toxic ☐ flammable ☒ corrosive ☐ explosive

Bulk Volume: 7 ☐ gal ☐ tons ☐ bbl 42 ☐ other

Containers: 7 (Number) ☒ drums ☐ cartons ☐ bags ☐ other

Physical State: ☒ solid ☐ liquid ☐ sludge ☐ other (specify)

Special Handling Instructions (if any): no PCB

The waste is described to the best of my ability and it was delivered to a licensed liquid waste hauler (if applicable).

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

J.E. Healy 9/29/80
Signature of authorized agent and title

HAULER OF WASTE (Must be filled by hauler)

Name (print or type): ERICKSON TRUCKING, INC — Code No.

Business Address: 255 Parr Boulevard, Richmond, Calif. 94801

Telephone Number: (415) 235-1393 Pick Up Date: 9/29/80 Time: [illegible] ☐ am ☐ pm

State Liquid Waste Hauler's Registration No. (if applicable): 19

Job No.: 7375 No. of Loads or Trips: 1 Unit No.: [illegible]

Vehicle: ☐ vacuum truck 7 barrels, ☒ flatbed, ☐ other ____ (specify)

The described waste was hauled by me to the disposal facility named below and was accepted.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

[signature]
Signature of authorized agent and title

DISPOSER OF WASTE (Must be filled by disposer)

Name (print or type): — Code No.

Site Address:

The hauler above delivered the described waste to this disposal facility and it was an acceptable material under the terms of RWQCB requirements, State Department of Health regulations, and local restrictions.

Quantity measured at site (if applicable): ____ State fee (if any): ____

Handling Method(s):
☐ recovery
☐ treatment (specify): — Code No.
(Examples: incineration, neutralization, precipitation)
☐ disposal (specify): ☐ pond ☐ spreading ☐ landfill ☐ injection well ☐ other (specify): — Code No.

If waste is held for disposal elsewhere specify final location:

Disposal Date:

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signature of authorized agent and title

The site operator shall submit a legible copy of each completed Record to the State Department of Health with monthly fee reports.

Disposal Location Pond No. ____ Acct. ____

☐ Treated — O/H Fee: $ ____ ☐ Untreated O/H Fee $ ____

☐ Non-Hazardous — No O/H Fee. Tag No ____

Instructions:
BLDG. 12 JACK HEALY EXT. 4376

FOR INFORMATION RELATED TO SPILLS OR OTHER EMERGENCIES INVOLVING HAZARDOUS WASTE OR OTHER MATERIALS—CALL (800) 424-9300.

INVOICE/SHIPPING ORDER

...e Aerospace &
...mmunications Corporation

Western Development
Laboratories Division
3939 Fabian Way
Palo Alto, California 94303
Remit To: Attn. Cashier M/SE02

SIGNATURE (Shipping) K. Frederick | CONTROL DOCUMENT NO. 100785 | DATED 9-24-80 | PAGE 1 OF 1

AUTHORITY OR PURPOSE

KSSS Z21A

DISPOSAL OF LIGHT BALIASTS WHICH CONTAIN A HAZARDOUS MATERIAL PCB. THEY MUST BE DISPOSED OF PER U.S. GOV'T EPA REQUIREMENTS. B-8 NOT BILLABLE

ACCOUNTING DATA – TRANSFER OF ACCOUNTABILITY

J. HEALY X-4976 PERSONNEL SERVICES & SECURITY

SHIPPED FROM
...TO, CALIFORNIA

TO

...EA CLASS I DISPOSAL SITE
...EDRO RD
...BARBARA, CA 93108

DATE SHIPPED | SHIP VIA | B/L NUMBER

WDL PART NO. / DESCRIPTION	SHIP UNIT	SHIP QTY.	COND CODE	UNIT PRICE	TOTAL PRICE	RECEIVED QTY.	BY	INSPECTION QTY.	
BALIASTS	102	8,883	LBS	PCB					
BALIASTS & CAPACITORS	135	14,306	5 LBS	PCB					
BALIASTS & CAPACITORS	114	11,114	LBS	PCB					
BALIASTS	126	9,713	LBS	PCB					
BALLASTS	120	10,829	LBS	PCB					
BALLASTS	107	11,086	LBS	PCB					
BALLASTS	102	12,259	LBS	PCB					

RECEIVED BY _____

DATE _____

kf RFS# 183293

TOTALS THIS PAGE

TOTALS

TOTALS THIS SHIPMENT

DEV | INSPECTED BY QA | WEIGHT | VOLUME | TOTAL CONTAINERS | REC. BY

PERMIT NUMBER 2 - 0 4 5 3

Date of Issue 0 5 2 2 8 0

CALIFORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT

California Department of Health Services
Hazardous Materials Management Section

60595

Pursuant to Section ~~66852~~ Title 22, Division 4, California Administrative Code, approval is granted to:

J. E. Healy
Division Safety Engineer
Ford Aerospace & Communications Corp.
3939 Fabian Way
Palo Alto, CA 94303

Telephone No. 4 1 5 | 4 9 4 - 7 4 0 0 X4976

County Santa Clara

For Office Use Only — Co. No. 4 3 Site No. 0 5 Hauler No. 0 1 9

to dispose of the wastes listed below subject to acceptance by:

Oscar E. Erickson Company
249 Tewksbury Avenue
Richmond, CA 94801

(Registered Hazardous Waste Hauler Name and Address)

and

Casmalia Class I Disposal Site
539 Ysidro Road
PO Box 5275
Santa Barbara, CA 93108

Disposal Site Name and Address

Type of Disposal:

- ☐ Injection Well
- ☐ Ponding
- ☐ Treatment
- ☐ Spreading
- ☐ Recovery
- ☐ Other _____

☒ Burial – All wastes must be buried in their sealed containers upon arrival at the site. These containers must be placed with care to guard against rupture during the burial process.

☐ Additional disposal conditions are listed on the attached sheet.

All handlers must be instructed in safety precautions for handling the materials to ensure worker and public safety.

Description of Waste: *(additional wastes on following pages)*

waste component	upper	lower	%	ppm	quantity	
Polychlorinated biphenyls			☐	☐	100 (total)	lbs. (unit)
from fluorescent lamp ballasts			☐	☐		
and capacitors and from a			☐	☐	*(if this is for a one year permit, give yearly estimate)*	
large transformer capacitor			☐	☐		
			☐	☐		

For Office Use Only

unit code	component

Description of Packaging, Containerization and Transport: Drums ☒, Cartons ☐, Bottles ☐, Tank Truck ☐,
Other Sturdy box or metal drum ☒

Packaging, containerization, and transport of the material shall be in accordance with Title 49, Code of Federal Regulations for hazardous materials, and with regulations of the California Highway Patrol, Title 13, California Administrative Code, for intrastate transport of hazardous materials. and in accordance with Title 40, CFR, for PCBs.

Permit to be used on a one time basis . . . . . ☒

Permit to be used for a period of one year from date of issue until (expiration date) _____ ☐

The producer shall be responsible for renewing permit before expiration date and for recording the Extremely Hazardous Waste Permit Number" in the lower right corner of the California Liquid Waste Hauler Record accompanying the waste. If there are any questions, please contact:

David L. Storm, Ph.D., Regional Administrator, Berkeley
California Department of Health Services
Hazardous Materials Management Section

Attachment No. 2

D R A F T

FORD AEROSPACE & COMMUNICATIONS CORP.
WDL - DIVISION
CHEMICAL WASTE SPILL PLAN

I. Planning Basis

A. Purpose

The purpose of this plan is to establish responsibilities and actions required to meet Ford Aerospace & Communications Corporation's obligation of providing effective and timely response in the event of spillage of hazardous wastes as required by the Resources Conservation and Recovery Act.

II. Scope

This plan covers spills and potential spills of hazardous chemical wastes such as acids, solvents, corrosives, heavy metals and cyanides which are stored at the hazardous waste storage facility north of Building 12.

III. Activation

This contingency plan will be activated whenever any employe or other person reports a leak, spill, or potential discharge of hazardous waste(s). All initial notifications of such incidents will be directed to the Security Dispatcher - phone number 5000. In the event the initial report indicates a "small" leak, a Security Officer or other person familiar with Section IV of this plan will be sent to investigate and report the exact details. The appropriate spill response will then be initiated following the "Spill Response Checklist." (Attach: A)

IV. Concept of Operations

A. Notification

1. Any employe who observes a leak, potential leak, or other dangerous situation involving chemical wastes should report the details to Security (extension 5000).

B. Initial Response

Security should obtain information following attachment I and activate the spill response plan.

1. Activation of spill response plan

a. Major:

Notify & provide details to

Emergency coordinator _____ ext. _____

Spill response team leader _____ ext. _____

b. Minor:

Dispatch Security Officer or spill response team leader to investigate.

C. Immediate On-Scene Actions

The following actions should be taken by the first person on the scene who is familiar with this plan and knowledgeable of hazardous materials.

1. Identify the material and level of hazard.

2. Take any feasible steps necessary to protect or save human life.

D. Chemical emergency coordinator or alternate.

When informed of an incident involving the chemical waste storage facility the coordinator or alternate will:

1. Determine which level of response is indicated as follows:

a. No emergency: Spill can be cleaned up as part of the routine duties of assigned personnel.

b. Level 1: Incident requires immediate attention but can be handled to conclusion by plant personnel.

c. Level 2: Incident requires plant personnel and immediate assistance from a chemical cleanup contractor.

d. Level 3: Incident involves a significant threat of fire, explosion or major spill. Notify Palo Alto FIRE DEPARTMENT (phone 911) and emergency coordinator.

2. Determine what protective clothing and equipment and notify all response personnel.

3. Consider ordering the following actions:

a. Limit access to area north of Building 12.

b. Establish control and perform all operations from an upwind location.

c. Establish a perimeter line and assure proper decontamination before equipment or personnel leave the area.

d. If there are casualties requiring medical attention, take only necessary life-saving actions prior to the arrival of a qualified hazardous materials specialist and/or physician. Insure that ambulance attendants and medical facilities are aware of possible contamination.

E. Chemical emergency team response

Level 1: Spill which can be handled entirely by plant personnel

1. Take appropriate actions to contain and/or prevent any spread of the material.

2. Transfer material from leaking container to a certified new container if appropriate.

3. Clean up spilled material and contaminated absorbent, etc.

4. Place all equipment, tools, containers, protective clothing, etc. in plastic bags and label "potentially contaminated". This material is to be cleaned and returned to service under the supervision of the Industrial Hygiene Department.
5. Submit a report to the Emergency Coordinator summarizing the incident; specifically citing equipment, procedures, and training needed to prepare for future similar spill.

Level 2: Spills which require professional clean-up company assistance, but do not require Fire or Police emergency response.

1. Take appropriate actions to contain the spilled material.
2. Call IT CORPORATION (800) 262-1900 or other firm which specializes in emergency chemical clean up. The response team member who has observed the problem should make this call and provide first hand information regarding the extent of the hazards and the exact assistance required.
3. Perform any actions indicated by the IT supervisor while awaiting the IT team arrival.
4. Assist the IT team as appropriate.
5. Perform items Level I, 4 and 5 as indicated.

Level 3: Serious emergencies which require Fire Department or other local emergency assistance.

1. Advise security the exact location where the Fire Department should report.
2. Evaluate the incident, especially the need for self-contained breathing apparatus and convey this to the Fire Department if appropriate.

3. Without endangering personnel, take appropriate action to contain the spill and subsequent water used in firefighting.
4. The person with the most knowledge of the total problem should meet the responding fire chief at a safe location and appraise him of the problem.
5. Assist the fire department until the emergency is over.
6. Continue Level 1 or 2 response as indicated.

F. After appropriate action by the emergency personnel the chemical emergency coordinator will:

1. Assure that all waste and spill containment material is cleaned up, secured in appropriate waste containers and that the area is returned to its previous environmentally acceptable state.
2. Conduct an assessment of the emergency response including evaluation of the plan, training, adaquacy of supplies and equipment and support by outside agencies. Upon completion of the assessment appropriate changes in planning, training and equipment should be implimented.
3. Secure replacement for supplies and equipment used during the incident or needed to effect a more satisfactory response in the future.

REFERENCE #4

CONTACT REPORT

AGENCY: Napa County Environmental Health

ADDRESS:

PERSON CONTACTED: Catherine Moody

PHONE NO.: (707) 253-4471

FROM: Al Wanger

TO: CERCLA File

DATE: 8/21/87

SUBJECT: History of closure activities at Ford Aerospace

The following information was gained from Ms. Moody:

Ms. Moody formerly worked for DHS and did inspect the Ford Aerospace storage facility at Fabian Way. However, she never did inspect the storage facility at East Meadow Circle. No paperwork was ever discovered in DHS files that would indicate that the facility had been closed properly. She suggested that I talk with Charlene Williams of DHS (Emeryville) who had worked in the Permits unit during the early 1980's.

REFERENCE #5

STATE OF CALIFORNIA—HEALTH AND WELFARE

EDMUND G. BROWN JR., Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814

Facility:	Ford Aerospace and Communications Corp., WOL Division 1036 East Meadow Circle Santa Clara County Palo Alto, CA 94303	INTERIM STATUS DOCUMENT Number: CAD 000030528 Effective Date: December 16, 1981
Operator:	Ford Aerospace and Communications Corporation 3939 Fabian Way Palo Alto, CA 94303	

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to Ford Aerospace and Communications Corporation subject to the conditions set forth in Attachment A which by this reference is incorporated herein.

Peter A. Rogers, Acting Chief
Hazardous Waste Management Branch

ATTACHMENT A

Interim Status Document

Ford Aerospace and Communications Corp., WOL Division
1036 East Meadow Circle
Santa Clara County
Palo Alto, CA 94303

I. GENERAL CONDITIONS

1. Identification and general responsibilities of operator.

Ford Aerospace and Communications Corporation, hereinafter called the operator and/or owner, shall comply with the provisions of the California Health and Safety Code, including Chapter 6.5 of Division 20, and with the Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22 of the California Administrative Code). The following requirements set forth in Chapter 30, Division 4, Title 22, California Administrative Code, should be particularly noted:

(a) The owner or operator shall ensure that the operation of the facility will not imperil public health and safety, wildlife, domestic livestock, or the environment.

(b) The owner or operator shall allow the California State Department of Health Services or the local health agency to inspect the facility, take samples of wastes, and inspect pertinent records.

(c) The owner or operator shall maintain the qualified personnel and the equipment necessary to provide for the safe operation of the facility.

(d) The owner or operator shall notify the California State Department of Health Services of a proposed change in ownership of the facility, in the method of operation of the facility, or of proposed closure of the facility 30 days prior to such event.

(e) The operator shall report to the California State Department of Health Services, within 24 hours after occurrence, all accidents involving hazardous wastes which resulted in, or could have resulted in, a hazard to public health and safety, wildlife, domestic livestock, or to the environment.

2. Records.

The owner or operator shall file this Interim Status Document at the facility and at his place of business.

3. Operation plan.

   Unless he has already done so, the owner or operator shall submit to the California State Department of Health Services within six months after receiving specific written notice from the Department to do so, an operation plan in accordance with Section 66376, Title 22 of the California Administrative Code.

4. Prohibited acts.

   The owner or operator shall not do any of the following acts:

   (a) Treat, store, or dispose of hazardous wastes which are not identified.

   (b) Employ processes not described in the application.

   (c) Make substantial modifications or additions to the facility.

5. Limitation.

   The owner or operator shall comply with the conditions of this document and with any new or modified conditions which the California State Department of Health Services deems necessary to protect public health or the environment. A new interim status condition or a modification of an existing interim status condition shall become effective on the date that written notice of such change is received by the owner or operator.

NOTE: Unless explicitly stated otherwise, all cross references to items in this Interim Status Document shall refer only to items occurring within the same Part. All Parts are identified by Roman numerals. The items set forth in each Part shall apply to the owner, operator, and/or facility in addition to the items set forth in any preceding and/or following Part of this document.

II. SPECIAL CONDITIONS

1. Storage of wastes.

(a) Hazardous waste shall not be stored at the facility for longer than one year without written approval from the California State Department of Health Services.

(b) If a hazardous waste is stored at the facility longer than one year, the owner or operator shall pay to the California State Department of Health Services a fee, as if the waste had been disposed of on land, in accordance with Article 8, Chapter 30, Division 4, Title 22 of the California Administrative Code. The fee shall be paid in the 13th month of storage.

(c) Hazardous waste shall be stored in a secure enclosure such as a building, room or fenced area, which shall prevent unauthorized persons from gaining access to the waste, and in a manner that will prevent spills. A caution sign shall be posted and visible from any direction of access or view of hazardous waste stored in such enclosure. Wording of caution signs shall be in English, "Caution-Hazardous Waste Storage Area-Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas".

(d) Each hazardous waste storage area shall have a continuous base that is impervious to the waste to be stored and shall be designed and constructed so that any surface water runoff or spills can be contained.

2. Storage in tanks.

(a) Each hazardous waste storage tank situated above ground shall have a spill confinement structure (e.g., dike or trough) capable of holding the entire contents of the tank plus sufficient free-board.

(b) Hazardous waste storage tanks shall be constructed of materials which are compatible with the wastes to be contained or shall be protected by liners which are compatible with those wastes.

(c) Prior to use, new, replacement, and repaired hazardous waste storage tanks and their appurtenances shall be certified by an engineer registered in California to be structurally sound and of adequate construction for the intended use.

(d) Each hazardous waste storage tank and storage area shall be individually marked with the internationally recognized hazard identification system placards developed by the National Fire Prevention Association (NFPA).

(e) Valves on hazardous waste storage tanks shall be kept locked when the facility is unattended.

3. Storage in containers.

(a) Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled or moved.

(b) Areas used for storing containers of hazardous waste shall be widely separated, or physical barriers shall be provided to ensure that commingling of incompatible hazardous wastes cannot occur if a container ruptures.

(c) A label shall be maintained on all containers in which hazardous wastes are stored for 90 days or more and records for the storage of all hazardous wastes shall be maintained pursuant to Section 66545, Title 22 of the California Administrative Code. Labels shall include the following information:

(1) Composition and physical state of the waste;

(2) Special safety recommendations and precautions for handling the waste;

(3) Statement or statements which call attention to the particular hazardous properties of the waste;

(4) Amount of waste and name and address of the person producing the waste; and

(5) Date of acceptance at the storage facility.

(d) Empty containers contaminated with hazardous materials shall be stored, handled, processed and disposed of as hazardous wastes.

4. Recycling.

(a) The mixing or blending of potentially imcompatible materials and wastes for purposes of recovering resources, neutralizing wastes, or detoxifying wastes shall be carried out under controlled conditions to ensure that violent reactions, extreme heat, or fire do not occur and that toxic or flammable gases and vapors are not discharged into the atmosphere.

(b) If requested by the California State Department of Health Services in accordance with Article 12, Chapter 30, Division 4, Title 22, California Administrative Code, the owner or operator shall submit a written statement justifying having not recycled a waste which the Department has determined to be recyclable.

5. Management of extremely hazardous wastes.

The operator shall ensure that extremely hazardous wastes are handled in accordance with the terms of an Extremely Hazardous Waste Disposal Permit issued by the California State Department of Health Services, pursuant to Article 7, Chapter 30, Division 4, Title 22, California Administrative Code.

6. Management of powdered wastes.

To prevent hazardous waste from being blown by the wind, hazardous waste in the form of powder, dust or a fine solid shall be handled, treated, stored and disposed of in covered containers or, if the waste is not water reactive, shall be wetted as a slurry.

7. Management of asbestos wastes.

Asbestos-containing wastes shall be managed in accordance with the following instructions:

(a) Wastes in sealed, nonreturnable containers shall be handled, disposed of, and covered without opening, breaking, or rupturing the containers.

(b) Wetted wastes in bulk shall not be allowed to dry to such a state that airborne asbestos fibers would result.

(c) Dry wastes in bulk shall be thoroughly wetted to prevent the blowing of asbestos fibers.

(d) All asbestos-containing wastes destined for disposal at the facility shall be covered with at least six inches of compacted soil or nonhazardous solid waste within 24 hours after receipt at the disposal area or site.

8. Wastes prohibited.

Hazardous wastes described below shall not be handled at the facility:

(a) Extremely hazardous wastes as defined in Sections 66064 and 66685, Title 22, California Administrative Code, unless specifically approved by a written permit from the California State Department of Health Services.

(b) Burning wastes.

(c) Forbidden and Class A explosives as defined in Sections 173.51 and 173.53, Title 49, Code of Federal Regulations.

(d) Water-reactive wastes as defined in Section 66236, Title 22 of the California Administrative Code.

9. Management of incompatible wastes.

Each of the following categories of incompatible hazardous wastes shall be adequately separated during all handling, storage, and disposal operations:

(a) Alkalies and cyanides.

(b) Acids.

(c) Strong oxidizers.

10. Management of PCB wastes.

PCB wastes shall be managed in accordance with the requirements of Part 761, Title 40, Code of Federal Regulations.

11. Public water supply.

If a public water supply is used at the facility, the service connection shall be protected from contamination as specified in Section 7604, Title 17 of the California Administrative Code.

12. Fencing.

The perimeter of the hazardous waste area of the facility shall be secured by a well-maintained fence, capable of preventing the intrusion of livestock and of discouraging entry by unauthorized persons. If the entire facility is appropriately fenced, if the general public does not have access to the hazardous waste area, and if the hazardous waste area is posted with warning signs as described elsewhere in this document, no additional fence shall be required around the hazardous area unless the absence of such a fence could result in a hazard to health, safety, or the environment.

13. Telephone or radio communications.

A telephone or radio for summoning aid in the event of an emergency shall be in workable condition and available for immediate use by personnel working in the hazardous waste area of the facility.

14. Protective clothing.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of the following National Institute of Occupational Safety and Health (NIOSH) approved equipment if appropriate:

(a) Protective head gear and face masks.

(b) Chemically resistant apparel and gloves.

(c) Self-contained breathing apparatus and respirators with the approved cartridges.

III. SAFETY, EQUIPMENT, AND EMERGENCY RESPONSE

1. Identification number.

   The facility owner or operator shall have an identification number issued by the U.S. Environmental Protection Agency (EPA).

2. Notices.

   (a) If the owner or operator has arranged to receive hazardous waste from a foreign source, he shall notify the California State Department of Health Services in writing at least four weeks in advance of the date that the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.

   (b) Before transferring ownership or operation of the facility during its operating life or during the post-closure care period, the owner or operator shall notify the new owner or operator in writing of the conditions of this document.

3. Analysis of waste.

   (a) (1) Before the owner or operator treats, stores, or disposes of a particular type of hazardous waste for the first time, he shall obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis shall contain all the information which must be known to treat, store, or dispose of the waste in accordance with the conditions of this document.

   (2) The analysis may include data developed for other purposes, and existing published or documented data on the hazardous waste or on waste generated from similar processes.

   (3) The analysis shall be repeated as necessary to ensure that it is accurate and up-to-date. At a minimum, the analysis must be repeated when the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.

   (b) Upon the effective date of this document, the owner or operator shall follow a written waste analysis plan which describes the procedures which will be used to comply with Item 3 (a). The plan shall be subject to approval by the California State Department of Health Services and shall be kept at the facility. At a minimum, the plan shall specify:

(1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;

(2) The test methods which will be used to test for these parameters;

(3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

(i) One of the sampling methods described in Appendix I, Part 261, Title 40, Code of Federal Regulations; or

(ii) An equivalent sampling method approved by the California State Department of Health Services.

(4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;

(5) Where applicable, the methods which will be used to meet any additional waste analysis requirements for specific waste management methods as specified elsewhere in this document.

4. Security.

(a) The owner or operator shall prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the facility.

(b) The facility shall have:

(1) A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or

(2) (i) An artificial or natural barrier which completely surounds the active portion of the facility and which would prevent unauthorized entry; and

(ii) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility).

(c) Upon the effective date of this document, a sign with the legend, "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out," shall be posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend shall be written in Engligh and Spanish, "Cuidado! Zona De Residuous Peligrosos. Prohibida La Entrada A Personas No Autorizadas", and shall be legible from a distance of at least 25 feet. Existing signs with a legend other than "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

5. Inspections.

(a) The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing--or may lead to--release of hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

(b) (1) The owner or operator shall follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.

(2) The schedule shall be subject to approval by the California State Department of Health Services.

(3) He shall keep this schedule at the facility.

(4) The schedule shall identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).

(5) The frequency of inspection may vary for the items on the schedule. However, it shall be based on the rate of

possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas shall be inspected daily when in use. At a minimum, the inspection schedule shall include the items and frequencies called for elsewhere in this document.

(c) The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which shall be subject to approval by the California State Department of Health Services and which shall ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

(d) The owner or operator shall record inspections in an inspection log or summary. He shall keep these records for at least three years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

6. Personnel training.

(a) (1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the conditions of this document. The owner or operator shall ensure that this program includes all the elements described under Item 6 (a)(3).

(2) This program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

(3) At a minimum, the training program shall be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

(i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

(ii) Key parameters for automatic waste feed cut-off systems;

(iii) Communications or alarm systems;

(iv) Response to fires or explosions;

(v) Response to ground-water contamination incidents; and

(vi) Shutdown of operations.

(b) Facility personnel shall have successfully completed the program required in Item 6 (a) by the effective date of this document or within six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of this document shall not work in unsupervised positions until they have completed the training requirements of Item 6 (a).

(c) Facility personnel shall take part in an annual review of the initial training required in Item 6 (a).

(d) The owner or operator shall maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

(2) A written job description for each position listed under Item 6 (d)(1). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Item 6 (d) (1); and

(4) Records that document that the training or job experience required under Items 6 (a), (b), and (c) has been given to, and completed by, facility personnel.

(e) Training records on current personnel as required in Item 6 (d) 4 shall be kept until closure of the facility. Training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

7. Ignitable, reactive, or incompatible wastes.

(a) The owner or operator shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

(b) The treatment, storage, or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials shall be conducted so that it does not:

(1) Generate extreme heat or pressure, fire or explosion, or violent reaction;

(2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;

(3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

(4) Damage the structural integrity of the device or facility containing the waste; or

(5) Through other like means threaten human health or the environment.

8. Maintenance and operation of facility.

The facility shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

9. Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, shall be tested and maintained as necessary to ensure its proper operation in time of emergency.

10. Required aisle space.

The owner or operator shall maintain aisle space as needed to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

11. Arrangements with local authorities.

(a) Upon the effective date of this document, the owner or operator shall attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator shall document the refusal in the operating record.

12. Purpose and implementation of contingency plan.

(a) Upon the effective date of this document, the owner or operator shall have a contingency plan for the facility. The contingency plan shall be subject to approval by the California State Department of Health Services and shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

(b) The provisions of the plan shall be carried out immediately wherever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

13. Content of contingency plan.

(a) The contingency plan shall describe the actions facility personnel shall take to comply with Items 12 and 17 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(b) If the owner or operator has already prepared some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the conditions of this document.

(c) The plan shall describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to Item 13.

(d) The plan shall list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see Item 18), and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

(e) The plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(f) The plan shall include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan shall describe signal(s) to be used to begin evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous wastes or fires).

14. Copies of contingency plan.

A copy of the contingency plan and all revisions to the plan shall be:

(a) Maintained at the facility; and

(b) Submitted to the California State Department of Health Services and to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

15. Amendment of contingency plan.

The contingency plan shall be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The list of emergency coordinators changes; or

(d) The list of emergency equipment changes.

16. Emergency coordinator.

At all times, there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

17. Emergency procedures.

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) shall:

(1) Immediately activate internal facility alarms or communication systems, where applicable, to notify all facility personnel;

(2) Immediately notify appropriate State or local agencies with designated response roles if their help is needed; and

(3) Notify the California State Department of Health Services by telephone or telegraph within 24 hours of occurrence.

(b) Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately identify the character, exact source, amount, and areal extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.

(c) Concurrently, the emergency coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

(d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the findings shall be reported as follows:

(1) The emergency coordinator shall immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510, Title 40, Code of Federal Regulations), or the National Response Center (using their 24-hour toll free number: 800/424-8802). The report shall include:

(i) Name and telephone number of reporter;

(ii) Name and address of facility;

(iii) Time and type of incident (e.g., release, fire);

(iv) Name and quantity of material(s) involved, to the extent known;

(v) The extent of injuries, if any; and

(vi) The possible hazards to human health, or the environment, outside the facility.

(2) If his assessment indicates that evacuation of local areas may be advisable, appropriate local authorities shall be notified immediately. The emergency coordinator shall be available to help appropriate officials decide whether local areas should be evacuated.

(e) During an emergency the emergency coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous

waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

(h) The emergency coordinator shall ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(i) The owner or operator shall notify the California State Department of Health Services and local authorities, that the facility is in compliance with Item 17 (h) before operations are resumed in the affected area(s) of the facility.

(j) The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 30 days after the incident, he shall submit a written report on the incident to the California State Department of Health Services. The report shall include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

IV. RECORDKEEPING

1. Operating record.

   (a) The owner or operator shall keep a written operating record at the facility.

   (b) The following information shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

      (1) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility;

      (2) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;

      (3) Records and results of waste analyses and trial tests performed;

      (4) Summary reports and details of all incidents that require implementing the contingency plan;

      (5) Records and results of inspections (except these data need be kept only three years);

      (6) Monitoring, testing or analytical data where required; and

      (7) All closure cost estimates.

2. Availability, retention, and disposition of records.

   (a) All records including plans, required in this document shall be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or respresentative of the California State Department of Health Services who is duly designated by the Director;

   (b) The retention period for all records required in this document is extended automatically during the courseof any unresolved enforcement action regarding the facility or as requested by the California State Department of Health Services;

(c) A copy of records of waste disposal locations and quantities in Item 1 (b)(2) shall be submitted to the California State Department of Health Services and local land authority upon closure of the facility.

3. Annual report.

The owner or operator shall prepare and submit a single copy of an annual report to the California State Department of Health Services by March 1 of each year beginning March 1, 1982. The annual report shall cover facility activities during the previous calendar year and shall include the following information:

(a) The EPA identification number, name, and address of the facility;

(b) The calendar year covered by the report;

(c) A description and the quantity of each hazardous waste the facility received during the year;

(d) The method of treatment, storage, or disposal for each hazardous waste;

(e) Monitoring data where required;

(f) The most recent closure cost estimate;

(g) The certification signed by the owner or operator of the facility or his authorized representative.

4. Additional reports.

In addition to submitting the annual report required in Item 3, the owner or operator shall also report to the California State Department of Health Services:

(a) Releases, fires, and explosions;

(b) Ground-water contamination and monitoring data;

(c) Facility closure.

V. CLOSURE

1. Closure.

The owner or operator shall close his facility in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

2. Closure plan and amendment of plan.

(a) The owner or operator shall have a written closure plan. This plan shall be subject to approval by the California Regional Water Quality Control Board and shall be kept at the facility. This plan shall identify the steps necessary to close the facility completely at any point during its intended life and at the end of its intended life. The closure plan shall include, at least:

(1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description shall identify the maximum extent of the operation which will be unclosed during the life of the facility, and how Item 1 and other applicable conditions of this document will be met;

(2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;

(3) A description of the steps needed to decontaminate facility equipment during closure; and

(4) A schedule for final closure which shall include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory shall be included, as must the planned date for removing any residual wastes from storage facilities and treatment processes.)

(b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.

(c) The owner or operator shall submit his closure plan to the California Regional Water Quality Control Board at least 180 days before the date he expects to begin closure. The California Regional Water Quality Control Board will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments.

3. Time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.

(b) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The California Regional Water Quality Control Board may approve a longer closure period under Item 2 (c) if the owner or operator can demonstrate that: (1) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.

4. Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

5. Certification of closure.

When closure is completed, the owner or operator shall submit to the California Regional Water Quality Control Board certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. FINANCIAL RESPONSIBILITY

1. Cost estimate for facility closure.

   (a) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this document. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan.

   (b) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.

   (c) On each anniversary of the effective date of this document, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its *Survey of Current Business*. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor. The adjusted closure cost estimate shall equal the latest closure cost estimate (see Item 1(b)) times the inflation factor.

VII. TANKS

1. Operation.

   (a) Treatment or storage of hazardous waste in tanks shall comply with Item 7 (b), Part III of this document.

   (b) Hazardous waste or treatment reagents shall not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.

   (c) Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard, or the tank shall be equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 60 centimeters (2 feet) of the tank.

   (d) If hazardous waste is continuously fed into a tank, the tank shall be equipped with a means to stop this inflow (e.g., a waste feed-cutoff system or by-pass system to a stand-by tank).

2. Analysis of waste and trial tests.

   (a) If a tank is to be used for:

      (1) Chemically treating or storing a hazardous waste which is substantially different from waste previously treated or stored in that tank; or

      (2) Chemically treating hazardous waste with a substantially different process than any previously used in that tank; the owner or operator shall before treating or storing the different waste or using the different process:

         (i) Conduct waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests) to document that this proposed treatment or storage will comply with Items 1(a) and (b); or

         (ii) Obtain written information on similar storage or treatment of similar waste under similar operating conditions to document that this proposed treatment or storage will comply with Items 1 (a) and (b).

3. Inspections.

(a) The owner or operator of a tank must inspect, if applicable:

(1) Discharge control equipment (e.g., waste feed cut-off systems, and drainage systems), at least once each operating day, to ensure that it is in good working order;

(2) Data gathered from monitoring equipment (e.g., pressure and temperature gauges), at least once each operating day, to ensure that the tank is being operated according to its design;

(3) The level of waste in the tank, at least once each operating day, to ensure compliance with Item 1 (c);

(4) The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams; and

(5) The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

4. Closure.

At closure, all hazardous waste and hazardous waste residues shall be removed from tanks, discharge control equipment, and discharge confinement structures.

5. Ignitable or reactive waste.

(a) Ignitable or reactive waste shall not be placed in a tank, unless:

(1) The waste is treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of material is no longer ignitable or reactive and Item 7 (b), Part III of this document is complied with; or

(2) The waste is stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react; or

(3) The tank is used solely for emergencies.

(b) If the owner or operator treats or stores ignitable or reactive waste in covered tanks, he shall comply with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 through 2-6 of the "Flammable and Combustible Code--1977".

6. Incompatible Wastes.

(a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same tank, unless Item 7 (b), Part III of this document is complied with.

(b) Hazardous waste shall not be placed in an unwashed tank which previously held an incompatible waste or material.

VIII. STORAGE OF CONTAINERS

1. Condition.

   If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator shall transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the conditions of this document.

2. Compatibility of waste.

   The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Management.

   (a) A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or remove waste.

   (b) A container holding hazardous waste shall not be opened, handled, or stored in a manner which might rupture the container or cause it to leak.

4. Inspections.

   The owner or operator shall inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

5. Ignitable or reactive waste.

   Containers holding ignitable or reactive waste shall be situated at least 15 meters (50 feet) from the property line of the facility.

6. Incompatible wastes.

   (a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same container, unless the requirements of Item 7 (b), Part III of this document are met.

   (b) Hazardous waste shall not be placed in an unwashed container that previously held an incompatible waste or material unless the requirements of Item 7 (b), Part III of this document are met.

(c) A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

REFERENCE #6

Ford Aerospace &
Communications Corporation
Western Development
Laboratories Division

3939 Fabian Way
Palo Alto, California 94303

March 22, 1982

California Department of Health Services
Hazardous Materials Management Section
2151 Berkeley Way
Berkeley, California 94704

Attention Mr. Blake Spears

Subject: Hazardous Waste Storage Facility Closure
Ford Aerospace & Communications Corporation
1036 East Meadow Circle
EPA #CAD000030528

Dear Mr. Spears:

The following summarizes the closure of WDL's 1036 East Meadow Circle Hazardous Waste Storage Facility.

- o Waste Disposal
  2/25/82: 27/55 gal. drums containing various flammable and non flammable solvents (manifest #088-103424) transported to Casmalia Disposal Site (EPA #CAD020748125)

  3/12/82: 3/55 gal. drums containing flammable liquid poison n.o.s. and hazardous waste solid n.o.s. (manifest #088-103423) transported to Kettleman Hills Disposal Site (EPA #CAT000646117).

- o Waste Storage
  As of March 12, 1982 hazardous wastes will no longer be accepted for storage at 1036 East Meadow Circle. No hazardous wastes are presently stored at this location.

- o Decontamination
  The following procedures were completed by IT Corporation (service order #10013) on March 18, 1982:
  - Detergent wash/soak of the asphalt based storage area (Detergent: State Chemical Co. formula 999 degreaser/detergent)
  - Detergent/steam clean of the asphalt based storage area (Detergent: Tide)

- o Rinse solution from detergent steam cleaning operations collected via vacuum truck.

- 700 gallons of decontamination rinse solution as hazardous waste liquid n.o.s. (manifest #088-111113) transported to IT Corporation, Arthur Road, Martinez, California facility (EPA #CAD000094771) for disposal.

- Estimate of closure costs: $4.0K

Sincerely,

FORD AEROSPACE &
COMMUNICATIONS CORPORATION
WDL Division

Dan Hernandez
Division Industrial Hygienist

cc: File
Operating Log

REFERENCE #7

CONTACT REPORT

AGENCY: Ford Aerospace

ADDRESS:

PERSON CONTACTED: Dan Hernandez

PHONE NO.: (415)852-4012

FROM: Al Wanger

TO: CERCLA File

DATE: 9/18/87

SUBJECT: Ford Aerospace closure of East Meadow Circle facility

cc:

Mr. Hernandez provided the following information:

Ford Aerospace complied with RCRA requirements for hazardous waste management. In 1981, Ford established a central storage facility at the East Meadow Circle for handling hazardous wastes. Wastes were stored in the back portion of the property in drums that were segregated by waste type and surrounded by sandbag diking.

Blake Spears of DHS had been involved in the development of the ISD and later the closure plan for the storage facility. Mr. Hernandez stated that he believed that Blake Spears and either Amy Zimpfer or Suzie Jackson of the EPA had done the closure inspection. He further stated that Mike Pardee of DHS had also inspected the facility in 1986 and had told him that there was no problem with the site.

He also said that Ford had submitted all the necessary documentation for closure. However, because of an internal policy of Ford Aerospace that requires the destruction of old inactive files after three years, copies of the closure documents could not be provided. Mr. Hernandez said he would check all files to see if there was a chance that a copy still remained of the closure documents.

(Suzie Jackson and Blake Spears have left DHS and could not be reached for comment)

REFERENCE #8

CONTACT REPORT

AGENCY: Department of Health Services
Abandoned Site Program

ADDRESS:

PERSON CONTACTED: Mike Pardee

PHONE NO.: (916) 445-1803

FROM: Al Wanger

TO: CERCLA File

DATE: 9/29/87

SUBJECT: Ford Aerospace closure

cc:

Mr. Pardee said that he did an inspection of the Fabian Way facility during a preliminary assessment (PA) and found no problems at that site based on the criteria of the PA. However, he stated that he did not do an on-site inspection of the East Meadow Circle facility, and did not give a sign-off for closure of the facility. He also stated that during the initial PA of the East Meadow Circle facility, he could not find any evidence that a proper closure had been verified by DHS and had recommended a "pending" status until the Permits Units of DHS had dealt with the closure questions.